adherence to Mitigation Measure 4.5.4 would ensure that impacts remain less than significant. It should also be noted that, consistent with the requirements of a EIR, future site-specific implementing projects proposed within the Project area would require additional site-specific CEQA analysis at a later date.

Reference: Final EIR, pages 4.5-23 – 4.5-24.

GEOLOGY AND SOILS

Finding

Threshold 4.6.1.ii. Project construction and implementation would not expose people or structures to potential substantial adverse effects from strong seismic ground shaking with the implementation of mitigation measures (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessens the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

Small-scale inactive faults occur within the bedrock units underlying the Project site. These fractures are associated with major earthquakes along the San Andreas Fault, which runs along the western boundary of the Project site. Evidence from the fault investigation indicates that fractures have the potential to develop anywhere on the Project site as the result of an earthquake associated with active faults on site. In addition, the Project site contains several faults that are capable of strong ground motion. These faults are associated with the San Andreas and Painted Canyon Fault Zones.

Due to the presence of the San Andreas Fault and other active faults on and near the Project site, potential adverse impacts resulting from strong seismic shaking cannot be ruled out and are considered potentially significant. All future development would be subject to the provisions of the California Building Standards Code in Title 24, which provides regulations for structural design and construction with regard to seismic safety, as well as local regulations, ordinances, General Plan policies, standard conditions or requirements, and recommendations from the geotechnical report. Further, Mitigation Measure 4.6.1 requires a final geotechnical report to delineate the precise locations of all active faults within each planning area and to determine and refine any restricted use zones with known active and potentially active faults. Project conformance with such requirements would be adequate to ensure that potential impacts from the effects of ground shaking on any habitable structure, critical facility, or other infrastructure are reduced to less than significant. This analysis is consistent with the requirements of a EIR, and future site-specific implementing projects proposed within the Project area will require site-specific CEQA analysis at a later date.

Reference: Final EIR, pages 4.6-13 – 4.6-14.

Finding

Threshold 4.6.1.iii. Project construction and implementation would not expose people or structures to potential substantial adverse effects from seismic-related ground failure, including liquefaction, with the implementation of mitigation measures (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessens the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

The geotechnical investigation determined that if saturated, the Palm Spring Formation is prone to liquefaction and lateral spreading deformation during strong ground shaking. Future development of the Project site could therefore introduce large volumes of water into the subsoils, which could lead to localized perched water conditions within units that could become susceptible to localized liquefaction during strong ground motion.

Although implementation of the Project would potentially increase exposure of future development associated with implementing projects within the Project area to damage caused by secondary seismic impacts such as ground failure, including liquefaction, during an earthquake event, all future development would be subject to the provisions of the California Building Standards Code in Title 24, which provides regulations for structural design and construction with regard to seismic safety, as well as local regulations, ordinances, General Plan policies, standard conditions or requirements. Further, Mitigation Measure 4.6.1, which requires compliance with the recommendations in required future geotechnical studies, would reduce impacts on the Project site related to liquefaction to a less than significant level. Such conformance would be adequate to ensure that potential impacts from the effects of seismic-related ground failure, including liquefaction, would be reduced to less than significant. This analysis is consistent with the requirements of a EIR, and future site-specific development projects proposed within the Project area will require site-specific CEQA analysis at a later date.

Reference: Final EIR, pages 4.6-14 – 4.6-15.

Finding

Threshold 4.6.1.iv. Project construction and implementation would not expose people or structures to potential substantial adverse effects from landslides with the implementation of mitigation measures (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessens the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

Although landslides may occur as the result of seismic activity or other natural processes, the potential for such events can also be increased as the result of human activities such as grading or manufactured slope construction. The Palm Spring Formation is susceptible to landslides and block failures because of its abundant clay members, localized folding, and preexisting faults. Grading on the Project site could potentially decrease slope stability in some areas. Additionally, cobbles and boulders located on the tops of ridges and slopes onsite could potentially come loose during ground shaking associated with earthquakes on or near the Project site. Landsliding and rockfall could therefore be a potentially significant impact, particularly on the southwestern part of the Project site and in hillside areas.

All future development within the Project area would be required to comply with the requirements of the California Building Standards Code in Title 24. In areas where steep slopes occur that are susceptible to landslide hazards, a site-specific geologic and geotechnical investigation will be required to identify potential impacts and provide recommendations as to

slope stability and design requirements to reduce potential hazards resulting from landslides to a less than significant level (Mitigation Measure 4.6.3).

Reference: Final EIR, page 4.6-15.

Finding

Threshold 4.6.2. Project construction and implementation would not result in substantial soil erosion or the loss of topsoil.

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessens the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

As lands within the Project area are developed in the future, an increase in the disturbance of existing land surfaces from grading, development, or removal of existing vegetation/topsoil would potentially occur. As a result, the potential for erosion caused by wind and/or water would increase. During a storm event, there is a potential for soil erosion to occur on and in the vicinity of the Project site at an accelerated rate. The required Storm Water Pollution Prevention Plan (SWPPP) will identify specific Construction Best Management Practices (BMPs) to be implemented as part of the Project to minimize water quality impacts during construction, including those impacts associated with soil erosion.

The proposed Project would consist of large-scale grading and excavation activities that would alter existing slopes and established drainage paths, thus potentially leading to erosion. The Project design would incorporate erosion control devices, such as street gutters, storm drains, culverts, and detention basins to control runoff and prevent erosion to reduce or avoid soil loss on the site due to wind and water erosion. The potential for wind- and runoff-related erosion would be substantially reduced when the Project site is fully developed with structures, landscaping, and other erosion control devices (e.g. BMPs). Further, implementation of Mitigation Measures 4.6.1 and 4.9.1 will reduce potential erosion impacts to a less than significant level.

As applicable, future development will be required to comply with National Pollutant Discharge Elimination System (NPDES) requirements and BMPs to reduce potential effects on downstream water bodies, as the result of erosion. Future development within the Project area will be required to include erosion and sediment control measures as part of the grading plan in order to minimize land modification and potential erosional effects. Specific design measures would be implemented on a Project-specific basis, thereby reducing potential impacts caused by erosion and/or the loss of topsoil to less than significant.

Reference: Final EIR, pages 4.6-15 – 4.6-16.

Finding

Threshold 4.6.3. Project construction and implementation would not result in a geologic unit or soil becoming unstable as a result of the Project, resulting in on- or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse with the implementation of mitigation measures (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessens the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

Slope Stability. Project grading activities could potentially affect the stability of onsite slopes in certain areas. An analysis of proposed cut-and-fill slopes determined that slope stability would meet or exceed minimum requirements for slope stability. Site-specific geotechnical studies will be completed to identify the potential for landslides and unstable slope conditions within each planning area as Tentative Tract Maps are submitted, as required in Mitigation Measure 4.6.3. Implementation of Mitigation Measures 4.6.3 and 4.6.1, which require incorporation of recommended geotechnical measures into the final design plans, would reduce impacts associated with landslides and slope stability to a less than significant level.

Subsidence. Compressible and collapsible materials are expected to be found in the near-surface parts of the slopewash, landslide deposits, and alluvial deposits on the Project site. Removal of these materials would be required prior to placement of fill in those areas. Complete removal of all slopewash and shallow landslide deposits and removal of only the upper several feet of loose soils within alluvial units onsite are anticipated. As individual development lots would be underlain by soil and bedrock materials with variable expansion potentials, the final foundation design recommendations will be developed from the Project geotechnical studies on a lot-by-lot basis based on the actual expansion, soil, and bedrock characteristics underlying each lot. Implementation of Mitigation Measure 4.6.4 requiring site-specific geotechnical investigations, and adherence to the recommendations of those geotechnical investigations, would reduce the potential for subsidence impacts onsite to a less than significant level.

Lateral Spreading. Field observations indicated that, if saturated, the Palm Spring Formation is susceptible to liquefaction and lateral spreading during strong ground shaking. However, current geological conditions are much different, and the Palm Spring material is semi-consolidated and of greater density. Groundwater now also occurs at greater depths below the ground surface (over 50 feet). Therefore the potential for lateral spreading onsite is considered to be low. The potential for lateral spreading may increase within future cut slopes graded on the site, and therefore, proper drainage of irrigation and stormwater runoff to avoid saturation of the underlying Palm Spring Formation would minimize the potential for lateral spreading on the Project site. Implementation of Mitigation Measure 4.6.1 would further reduce impacts associated with lateral spreading to a less than significant level.

Liquefaction or Collapse. As stated, if saturated, the Palm Spring Formation is prone to liquefaction and lateral spreading deformation during strong ground shaking. Future development of the Project site could therefore introduce large volumes of water into the subsoils, which could lead to localized perched water conditions within units that could become susceptible to localized liquefaction during strong ground motion. Implementation of Mitigation Measure 4.6.1, which requires compliance with the recommendations in the final geotechnical studies, would reduce potential impacts related to liquefaction to a less than significant level.

Although implementation of the Project would potentially increase exposure of future development within the Project area to damage caused by hazards such as landslide, lateral spreading, subsidence, liquefaction, or collapse during an earthquake, all future development would be required to comply with the requirements of the California Building Standards Code in Title 24, as well as local regulations, ordinances, General Plan policies, standard conditions or requirements, and proposed mitigation, which are intended to reduce damage to structures and loss of life caused by an hazards associated with an earthquake event. Such conformance would be adequate to ensure that potential impacts from theses hazards on any habitable structure, critical facility, or other infrastructure would be reduced to less than significant with

mitigation. This analysis is consistent with the requirements of a EIR and future site-specific projects proposed within the Project area will require site-specific CEQA analysis at a later date.

Reference: Final EIR, pages 4.6-16 – 4.6-19.

Finding

Threshold 4.6.4. Project construction and implementation would not result in impacts with regard to expansive soils, as defined in Table 18-1-B of the Uniform California Building Code (1994), creating substantial risk to life or property with the implementation of mitigation measures (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessens the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

Expansive soils are found on the Project site within the Palm Spring Formation. Expansive soils may result in cracked walls, foundations, decks, sidewalks, garage floors, and/or driveways. Mitigation Measure 4.6.5 requires soil testing for expansive soils prior to construction and prescribes measures to be incorporated in the Project design where expansive soils are identified in areas proposed for development. Impacts would therefore be reduced to a level of less than significant.

Reference: Final EIR, page 4.6-19.

HAZARDS AND HAZARDOUS MATERIALS

Finding

Threshold 4.8.1. Project construction and implementation would not create a significant hazard to the public or the environment with the implementation of mitigation measures as a result of routine transport, use or disposal of hazardous materials (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessens the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

Construction

Project construction would involve the routine use of hazardous materials, including fuels, paints, and solvents. However, the amounts of these materials used during construction would be limited and regulated and would not pose a significant threat or be considered a significant environmental hazard. The construction contractor would implement BMPs related to hazardous materials storage and use during construction to reduce any potential release of a hazardous material to a less than significant level. Mitigation Measure 4.8.1 requires the development of a Hazardous Materials Contingency Plan to address potential impacts associated with contaminated groundwater during subsurface soil disturbance and groundwater activities and the potential to encounter onsite unknown hazards or hazardous substances during construction. Mitigation Measure 4.8.2 requires the development of a Health and Safety Plan for soil and groundwater disturbance that would address potential risks to construction workers during construction.

Based on the Phase I Environmental Site Assessment (ESA), impacts associated with asbestos-containing materials (ACMs), lead-based paints (LBPs), and polychlorinated biphenyls (PCB) containing fixtures would not occur because there are no existing buildings or structures on the Project site, and the Project does not include any utility relocation.

Operation

Operation of the Project would involve the use and storage of hazardous materials typically associated with residential, commercial, retail, public facility, and park uses such as solvents, cleaning agents, paints, and pesticides. This would result in a less than significant hazard to residents, employees, or visitors based on compliance with existing regulations regarding the transport, use, and disposal of hazardous materials.

Further, operation of the Project would not produce hazardous emissions or handle hazardous materials, substances, or waste beyond the typical household and commercial materials described above. Therefore, the Project would not create significant hazards to the public or to the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

All construction and operations from future development within the Project area would be subject to applicable federal, State, and local regulations, ordinances, General Plan policies, and standard conditions and mitigation (Mitigation Measures 4.8.1 and 4.8.2) which are aimed at reducing the potential for release of hazardous materials and providing necessary information and guidance to effectively respond to or address a release of hazardous materials, thereby ensuring a limited impact on the environment. Such conformance would be adequate to ensure that potential impacts from the effects of a release of hazardous materials on any habitable structure, critical facility, or other infrastructure would be reduced to less than significant.

Reference: Final EIR, pages 4.8-8 – 4.8-9.

Finding

Threshold 4.8.2. Project construction and implementation would not create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment with the implementation of mitigation (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessens the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

Construction

Construction of the Project would involve routine use of hazardous materials which may include fuels, paints, and solvents. However, the amount of these materials used during construction would be limited and regulated, and therefore, would not pose a significant threat or be considered a significant environmental hazard. In addition, the City is required to implement BMPs related to hazardous materials storage and use during construction activities. Implementation of Mitigation Measure 4.8.1 is also proposed to reduce potential impacts relative to a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Operation

Project operation would involve the use of potential hazardous materials (i.e., solvents, cleaning agents, paints, and pesticides) typical of residential, commercial, retail, public facility, and park uses. However, when used correctly, these materials would not result in a significant hazard to employees or community members. Operation of the Project would not produce hazardous emissions or handle hazardous materials, substances, or waste beyond the typical household and commercial materials. Therefore, the Project would not create significant hazards to the public or to the environment through reasonably foreseeable upset and accident conditions involving the release of materials into the environment since no acutely hazardous materials would be handled onsite. Compliance with existing laws and regulations, in conjunction with implementation of Mitigation Measures 4.8.1 and 4.8.2, would reduce potential impacts to less than significant levels.

Reference: Final EIR, page 4.8-9.

HYDROLOGY AND WATER QUALITY

Finding

Threshold 4.9.1. Project construction and implementation would not violate any water quality standards or waste discharge requirements with the implementation of mitigation (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessens the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

Construction

Pollutants of concern during construction include sediments, trash, petroleum products, dry and wet concrete waste, sanitary waste, chemicals, and other materials which have the potential to be spilled or leaked or transported via stormwater runoff into downstream water bodies (e.g. Whitewater River). During Project construction, exposed excavated soils would increase the potential for soil erosion, compared to existing conditions. Implementation of Mitigation Measure 4.9.1 would require that each phase of construction occur in compliance with the requirements of the Construction General Permit, including preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) and construction BMPs identified in the SWPPP to minimize erosion, prevent spills, and retain sediment and other pollutants onsite to avoid pollution to downstream receiving waters. This measure would reduce potential impacts related to potential violation of water quality standards or waste discharge requirements and degradation of water quality to a less than significant level.

Operation

Pollutants of concern during Project operation may include sediment, nutrients, organic compounds, trash and debris, oxygen-demanding substances, bacteria and viruses, oil and grease, pesticides, metals, and other materials. The Project would result in a permanent increase in impervious surface area on the site, which would increase the volume of stormwater runoff and would more effectively transport pollutants to receiving waters. Mitigation Measure 4.9.2 would require preparation and implementation of a Water Quality Management Plan (WQMP) for each phase of the Project. Site Design, Source Control, and Treatment BMPs specified in the WQMPs would be incorporated in the Project design to treat stormwater runoff

prior to discharge to the storm drain system. Further, Mitigation Measure 4.9.3 would require the preparation and implementation of a Maintenance and Management Program to ensure the ongoing functionality of the stormwater facility BMPs. The WQMP, BMPs, and Maintenance and Management Program for each Project phase would reduce potential operational impacts related to violation of water quality standards or waste discharge requirements and degradation of water quality to less than significant levels.

The Specific Plan allows for the provision of retention basins in open space areas on the Project site to provide flood control and water quality benefits as required by the City's Municipal Code. However, the Drainage Master Plan for the Project shows that retention basins are not anticipated to be required because they would be redundant with the existing East Side Dike downstream of the Project site. The Drainage Master Plan and associated hydrology are under review by the Coachella Valley Water District (CVWD). The Drainage Master Plan shows, subject to CVWD acceptance, that the existing East Side Dike would provide adequate flood control for the Project site and that no retention basins would be required. If the retention basins are not required for flood control, the water quality and sediment control functions of those retention basins would be met through water quality basins and other BMP features on the site, which would be developed in the WQMPs prepared for each Project phase. If approved by CVWD, the drainage plan without onsite regional retention basins as included in the Specific Plan would modify the Coachella Municipal Code requirements for 100 percent onsite retention.

If required by the CVWD, the onsite retention basins could provide habitat for larval mosquitoes. The location of the Project site downwind from agricultural areas may result in the increased need for fly and eye gnat control. Irrigation on the Project site could also increase the suitability of the site for red imported fire ants. Mitigation Measure 4.9.4 would require implementation of a vector control program to address the control of mosquitos, flies, eye gnats, and red imported fire ants. With implementation of Mitigation Measures 4.9.3 and 4.9.4, potential impacts related to vectors would be reduced to less than significant levels.

Reference: Final EIR, pages 4.9-13 – 4.9-16.

Finding

Threshold 4.9.6. Project implementation would not otherwise substantially degrade water quality with the implementation of mitigation (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessens the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

Construction

Refer to the Finding of Facts, above, relative to violation of water quality standards or waste discharge requirements. Implementation of Mitigation Measure 4.9.1 would require that each phase of construction occur in compliance with the requirements of the Construction General Permit, including preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) and construction BMPs identified in the SWPPP to minimize erosion, prevent spills, and retain sediment and other pollutants onsite to avoid pollution to downstream receiving waters. This measure would reduce potential impacts related to potential violation of water quality standards or waste discharge requirements and degradation of water quality to a less than significant level.

Operation

Refer to the Finding of Facts, above, relative to violation of water quality standards or waste discharge requirements. Implementation of Mitigation Measure 4.9.2 and 4.9.3 and the WQMP, BMPs, and Maintenance and Management Program for each Project phase would reduce potential operational impacts related to violation of water quality standards or waste discharge requirements and degradation of water quality to less than significant levels.

The Specific Plan allows for the provision of retention basins in open space areas on the Project site to provide flood control and water quality benefits as required by the City's Municipal Code. However, the Drainage Master Plan for the Project shows that retention basins may not be required because they would be redundant with the existing East Side Dike downstream of the site. If retention basins are not required for flood control, the water quality and sediment control functions of the retention basins would be met through water quality basins and other BMP features onsite, which would be developed in the WQMPs prepared for each Project phase.

If required by the CVWD, the onsite retention basins could provide habitat for larval mosquitoes, and may result in the increased need for fly and eye gnat control. Project irrigation could also increase suitability of the site for red imported fire ants. With implementation of Mitigation Measures 4.9.3 and 4.9.4, potential impacts related to vectors would be reduced to less than significant levels.

Reference: Final EIR, pages 4.9-13 – 4.9-16.

Finding

Threshold 4.9.3 and 4.9.4. Project implementation would not substantially alter the existing drainage pattern of the site or area with the implementation of mitigation (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessens the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

Construction

Grading and excavation activities would expose soil during construction, increasing potential for soil erosion compared to existing conditions. During a storm event, soil erosion and sedimentation could be accelerated. Further, Project grading and construction activities would compact soil, and construction of structures would increase onsite impervious area, which could increase stormwater runoff. Implementation of Mitigation Measure 4.9.1 would require preparation and implementation of a SWPPP and Construction BMPs for each Project phase to reduce water quality impacts during construction, including impacts associated with soil erosion and increased runoff. Such mitigation, which also requires compliance with the requirements of the General Construction Permit, would reduce potential construction impacts relative to erosion, siltation, and flooding to less than significant levels.

Operation

Development of the Project site would alter existing onsite drainage patterns and potentially increase stormwater runoff by increasing impervious surfaces onsite. The Project would include a comprehensive drainage system to collect and convey onsite storm flows. Mitigation Measure 4.9.5 requires preparation of a hydrology study for each Project phase to ensure that onsite stormwater collection and drainage facilities are appropriately sized to prevent onsite or offsite

flooding. Treatment BMPs, including bioswales and retention basins, would be incorporated in each Project phase as required in Mitigation Measure 4.9.2. These BMPs would be designed to convey stormwater and minimize onsite erosion and siltation.

Further, the Specific Plan allows for retention basins in the onsite open space areas to retain 100 percent of the 100-year, 24-hour storm event onsite and would not result in substantial erosion, siltation, or flooding offsite. Subject to CVWD acceptance, the existing East Side Dike would provide adequate flood control for the Project site and land uses, and the retention basins would not be required. Runoff from the site would continue to be retained temporarily by the East Side Dike, then be discharged to the Whitewater River (Coachella Valley Storm Drain Channel) via Wasteway No. 2. The Project site is located on the east side of the East Side Dike flood control embankment. As a result, the Project would not substantially alter existing regional flows that create ponding adjacent to the East Side Dike during a major event.

As discussed in the Drainage Master Plan, the proposed Project would increase runoff volume from the site by 296 acre-feet (af) for a one percent annual chance 24-hour storm event and by 196 af for the Standard Project Flood, which would increase the water surface elevation in the East Side Dike. Compared to existing conditions, the change in velocity of flows leaving the Project site would be minimal and is not anticipated to result in erosion. Changes to the flow conditions (peak flow, volume, and concentration) at the East Side Dike would be minor compared to existing conditions and are not anticipated to result in erosion of the dike. The proposed Project would reduce overland flows that currently inundate the Project site during large storm events. The flood limits and runoff velocities on the Project site would be substantially reduced in the with-Project condition. As a result, the Project would not substantially alter the existing drainage pattern in a manner that would result in substantial erosion, siltation, or flooding offsite. Implementation of Mitigation Measures 4.9.2 and 4.9.5 would reduce potential impacts to a less than significant level.

Reference: Final EIR, pages 4.9-17 – 4.9-19.

Finding

Threshold 4.9.5. Project implementation would not create or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff with the implementation of mitigation (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessens the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

Construction

Construction of the Project would potentially introduce pollutants into the stormwater drainage system as a result of erosion, siltation, and accidental spills. Further, Project grading and construction would compact soil and development of the site would increase the impervious areas, potentially increasing stormwater runoff during construction. Mitigation Measure 4.9.1 requires preparation and implementation of a SWPPP and Construction BMPs to reduce potential impacts to water quality. With implementation of Mitigation Measure 4.9.1, which also requires compliance with the Construction General Permit and implementation of BMPs during construction, construction impacts related to exceeding the capacity limits of, and providing additional sources of polluted runoff to, stormwater drainage systems would be reduced to less than significant levels.

Operation

Each phase of the Project would include a comprehensive drainage system to collect and convey onsite storm flows. A hydrology study would be prepared for each phase, as required in Mitigation Measure 4.9.5, to ensure that the onsite storm drain facilities are appropriately sized to prevent onsite flooding. If onsite retention basins are constructed as part of the Project, stormwater runoff would be retained onsite and, therefore, would not contribute runoff water that would exceed the capacity of the downstream storm drain facilities. If onsite retention basins are determined to not be required, the increased runoff from the site would continue to be retained temporarily by the East Side Dike with sufficient freeboard before being discharged to the Whitewater River (Coachella Valley Storm Drain Channel) via Wasteway No. 2. Therefore, operation of the Project would not exceed the capacity of the downstream storm drain system.

As required in Mitigation Measure 4.9.2, the Project, with or without the onsite retention basins, would include Site Design, Source Control, and Treatment BMPs to target pollutants of concern in runoff from the Project site. Therefore, the Project would not provide substantial additional sources of polluted runoff. With implementation of Mitigation Measures 4.9.2 and 4.9.5, operational impacts related to exceeding the capacity limits of, and providing additional sources of polluted runoff to, stormwater drainage systems would be reduced to a less than significant level.

Reference: Final EIR, page 4.9-20.

NOISE

Finding

Threshold 4.12.1. Project construction would not result in the exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, with the implementation of mitigation measures (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessen the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

Construction

The Project would expose residences constructed in the earlier Project phases within 100 feet of construction areas in later phases to construction noise levels up to 85 dBA Lmax (maximum noise level measured in A-weighted decibels) during site preparation. This noise is associated with the transport of construction equipment and materials, excavation, grading, and construction activities. Implementation of Mitigation Measure 4.12.1 would ensure that noise generated during Project construction would comply with the City's Municipal Code. Through such measures, noise impacts would be reduced to a less than significant level.

Operation

Noise Reduction at Planning Areas G6, G7, G9, G10, G11 and G12 along Avenue 50. Residences in the proposed Medium Density Residential area in Planning Area G12 that are within 256 feet of the Avenue 50 centerline would be exposed to traffic noise exceeding the exterior noise standards for residential uses (over a 24-hour period). To reduce exterior noise

levels to 60 dBA CNEL (Community Noise Equivalent level measured in A-weighted decibels) or lower, Mitigation Measures 4.12.2 and 4.12.3 would be implemented to require preparation of site-specific noise analyses for sensitive receptors and, as applicable, to require construction of sound walls for residences with outdoor living areas (backyard, patio, balcony, or deck). Uses proposed in the Mixed-Use Planning Areas include retail commercial, office commercial, high-density residential, and community/public facilities (Planning Areas G6, G7, G8, G9, G10, and G11) along Avenue 50. If residences are proposed in Planning Areas G9, G10, and G11 that are within the noise impact zones, sound walls and/or interior upgrade requirements would be required. Additionally, depending on the location of the proposed recreational facility within the proposed parks/recreation zone, sound walls and/or interior upgrades may be required if they are located within the 65 dBA CNEL impact areas.

Even with construction of the recommended sound walls, proposed residences along Avenue 50 would be exposed to traffic noise exceeding 57 dBA CNEL. With the windows open, rooms exposed to traffic noise higher than 57 dBA CNEL would not meet the 45 dBA CNEL interior noise standard. To ensure that windows can remain closed for prolonged periods of time, a mechanical ventilation system, such as an air-conditioning system, would be required to achieve the interior noise standard of 45 dBA CNEL at those residences.

Noise Reduction at Planning Areas G5, G8, G19, and G20 along I-10. Residences in Planning Areas G5 (High Density Residential), G8 (High Density Residential), G19 (Medium Density Residential), and G20 (Low Density Residential) within 2,100 feet, 975 feet, and 453 feet of the I-10 centerline, respectively, would be exposed to traffic noise exceeding the exterior residential noise standards. To reduce exterior noise levels, Mitigation Measure 4.12.4 would be implemented to require preparation of site-specific noise analyses for sensitive receptors and, as applicable, to require construction of sound walls for residential units with outdoor living areas (backyard, patio, balcony, or deck) along the segments of I-10 adjacent to those zones. Because it is not known at this time what specific types of mixed uses would be developed in Mixed-Use Planning Areas G6 and G7 along I-10, it is not feasible to identify location-specific sound reduction mitigation measures for the future land uses directly adjacent to I-10.

Even with recommended sound walls implemented, residences along I-10 would be exposed to traffic noise exceeding 57 dBA CNEL. Because all the frontline residences along I-10 are expected to be exposed to traffic noise higher than 57 dBA CNEL, an air-conditioning system is required for residences directly adjacent to I-10.

Implementation of Mitigation Measures 4.12.1 to 4.12.4 would reduce Project noise impacts during construction and operation to a less than significant level.

Reference: Final EIR pages 4.12-13 – 4.12-20.

Finding

Threshold 4.12.3. Project implementation would not result in a permanent increase in ambient noise levels above levels existing without the Project with the implementation of mitigation measures (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessen the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

Development of the Project would increase traffic noise levels on several roadway segments in the Project vicinity. However, there are either no existing noise-sensitive land uses or no noise-sensitive outdoor living areas that would be exposed to the traffic noise along these roads. Therefore, no significant offsite traffic noise impacts would occur as a result of the Project, and no mitigation measures would be required for offsite sensitive land uses.

Mitigation Measures 4.12.2 and 4.12.3 would be implemented for future proposed onsite uses that could be impacted by traffic noise to reduce this impact to less than significant levels. The construction of sound walls is recommended to reduce traffic noise levels in the outdoor active use areas to 60 dBA CNEL or lower to meet the City's exterior noise standard of 60 dBA CNEL. To achieve the interior noise level standard, building facade enhancements and mechanical ventilation (air conditioning) were identified to reduce the exterior noise inside the dwelling units to meet the 45 dBA CNEL interior noise standard. All measures specified are typically the minimum that would be required to meet established noise standards, and therefore, reduce noise to a level that is less than significant.

Reference: Final EIR, page 4.12-21.

Finding

Threshold 4.12.4. Project implementation would not result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project with the implementation of mitigation measures (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessen the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

Project construction would result in a temporary increase in ambient noise levels above existing levels without the Project. The greatest increase in noise levels would occur during site preparation caused by earthmoving equipment for each of the Specific Plan phases. However, such effects would be short-term because site preparation during each phase is assumed to last seven months, or five percent of the total time required for construction. Other construction activities such as building erection would generate lower noise levels, and the majority of the construction activity would occur more than 100 feet from the nearest receptors.

Project construction activities would be required to comply with time periods for construction as specified in the City's Municipal Code, and as listed in Mitigation Measure 4.12.1, which does not allow construction at nighttime. Compliance with the City's construction hour restrictions would reduce Project construction noise impacts to a less than significant level. Implementation of Mitigation Measure 4.12.1 would further reduce construction noise exposure for receivers adjacent to the Project site by requiring all construction equipment to be equipped with properly operating and maintained mufflers, placing all stationary equipment so that noise is directed away from noise-sensitive receptors and locating equipment staging areas to create the greatest distance between construction-related noise sources and noise-sensitive receptors. The temporary increase in ambient noise levels as a result of construction is not considered substantial and would be reduced to a less than significant level with mitigation incorporated.

Reference: Final EIR, pages 4.12-21 – 4.12-22.

5.0 FINDINGS CONCERNING IMPACTS FOUND TO BE SIGNIFICANT WITH MITIGATION ("Unavoidable Significant Impacts")

In evaluating the potential impacts associated with the Project, the Final EIR identified twenty potential impacts that were determined to be significant and unavoidable. This Section of the Statement of Facts and Findings identifies those impacts that may occur with Project implementation that were found to be significant even with the implementation of mitigation. The unavoidable significant impacts noted below are mitigated to the extent reasonable and feasible as described below, in the Mitigation Monitoring and Reporting Program, through Project Design Features noted in Section 2 above, and through Project Conditions of Approval and existing regulatory requirements and standard practices.

The following findings regarding significant environmental impacts that cannot be avoided are made consistent with CEQA Guidelines Section 15126(b) and 15126.2(b), and are also discussed in the Final EIR Section 6.3.

The Final EIR also discusses, pursuant to CEQA Guidelines Section 15126(c) and 15126.2(c), significant irreversible environmental changes, as set forth in Final EIR Section 6.1. Page 6-2 states that "*the commitment of limited, slowly renewable, and nonrenewable resources required for construction and operation of the proposed project would limit the availability of these resources for future generations or for other uses during the life of the project. However, the use of such resources for the project would be consistent with regional and local plans and projected growth in the area.*"

Pursuant to CEQA Guidelines Section 15126(d) and 15126.2(d), the Final EIR also discusses growth-inducing impacts of the proposed Project. Page 6-4 states that "*the project would require infrastructure improvements, traffic improvements, the extensions of Avenues 50 and 52, and the expansion of public services that would be considered growth inducing. However, because the La Entrada Specific Plan would use the project site for the approved McNaughton Specific Plan, the growth in this area has been anticipated by the City and the development of the site has been considered in the City's General Plan.*"

AESTHETICS, LIGHT, AND GLARE

Finding

Threshold 4.1.3. Project construction and implementation would substantially degrade the existing visual character of the site and its surroundings.

(1) All feasible changes, alterations and mitigation measures have been required in, or incorporated into the Final EIR that will avoid or substantially lessen the significant environmental effects with regards to degradation of the existing visual character of the site and its surroundings. However, despite such measures, the impacts will still be significant.

(2) There are no additional feasible mitigation measures which might avoid or reduce the significant environmental effects of the Project to a level that is less than significant because specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the Final EIR.

Complete mitigation is not possible to avoid the significant adverse Project impacts related to degradation of the existing visual character of the site and its surroundings.

Facts in Support of Finding

The proposed Project would permanently alter the existing visual character and quality of the site. The existing undeveloped desert terrain would be developed into a master-planned community with a mixture of residential, mixed-use, school, park/recreation, and open space uses that would permanently change the visual appearance of the affected lands. The Project includes extensions of Avenues 50 and 52 east from their present termini over the Coachella Canal, providing access into the Project site. Therefore, the existing visual character of the Canal would be altered, as there are currently no crossings of the Canal immediately adjacent to the Project site.

The Project design proposes open space areas and retention of the natural drainage courses onsite. However, development of the 2,200-acre site and the extension of arterial roads into and through the property would permanently alter the visual conditions of the land. Such changes may potentially degrade the visual character or quality of the site and its surroundings, or the views of surrounding areas, resulting in a significant impact. Project-related changes to the existing visual character of the site will be partially mitigated based on compliance with Standard Condition 4.1.1 which would require the applicant to provide detailed Project plans for architectural review by the City with the Tentative Tract Map submittal; the design requirements in the Specific Plan; the Project Design Features, including retention of the northern steeper slopes in natural open space; and, the hillside development guidelines in the Specific Plan. However, there are no additional feasible mitigation measures that can be implemented to reduce potential impacts to such permanent changes in the visual character to a less than significant level. Project-related impacts on visual character and quality would therefore be significant and unavoidable, even with Project compliance with Standard Condition 4.1.1 and applicable requirements of the Specific Plan.

Reference: Final EIR, pages 4.1-17 – 4.1-19.

AGRICULTURAL AND FORESTRY RESOURCES

Finding

Threshold 4.2.1. Project implementation would convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses.

(1) Existing programs, ordinances and General Plan policies or other considerations, including alternatives identified in the Final EIR will avoid or substantially lessen the significant environmental effects with regards conversion of farmland. However, despite such measures, impacts will still be significant.

(2) There are no additional feasible mitigation measures which might avoid or reduce the significant environmental effects of the Project to a level that is less than significant because specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the Final EIR (refer to Section 6, Findings Regarding Project Alternatives, and to the Statement of Overriding Considerations).

Complete mitigation is not possible to avoid the significant adverse Project impacts related to conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.

Facts in Support of Finding

Approximately 0.025 acres of the Project site is designated as Prime Farmland, and 9.535 acres are designated as Unique Farmland. These designated farmlands would be converted to non-agricultural uses with implementation of the Project. The conversion of the 0.025 acre of Prime Farmland would be 0.00075 percent of the total loss of Prime Farmland in the County during the 2008–2010 period, and the conversion of the 9.535 acre of Unique Farmland would be 0.54 percent of the total loss of Unique Farmland in the County during the same period. As Prime and Unique Farmlands are finite and irreplaceable resources, the conversion of these lands on the Project site to non-agricultural uses is a significant adverse impact. The Specific Plan allows for agricultural uses (as well as botanical gardens) in all "special use, community, neighborhood, and linear parks in the Specific Plan area" (Specific Plan Section 4.8.1). These parks are located throughout the Project as shown on Exhibit 2-10, Parks, Open Space, and Trails Plan. Agricultural uses are also permitting on an interim basis in all development areas (Specific Plan Section 4.3.12). The City is not aware of any legally enforceable mechanisms for in lieu fee payments or agricultural banks within Coachella Valley. Furthermore, arrangements with private parties (easements or Williamson Act contracts) cannot be guaranteed as adequate mitigation in the absence of a program to monitor and enforce such agreements. There are no other feasible mitigation measures for this Project impact, and impacts would remain significant and unavoidable.

Reference: Final EIR, pages 4.2-9 – 4.2-10.

AIR QUALITY

Finding

Threshold 4.3.1. Implementation of the Project would conflict with or obstruct implementation of the applicable air quality plan with the implementation of mitigation measures (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

(1) All feasible changes, alterations and mitigation measures have been required in, or incorporated into the Final EIR that will avoid or substantially lessen the significant environmental effects with regards to conflict with or obstruction of the applicable air quality plan. However, despite such measures, the impacts will still be significant.

(2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such agency or can and should be adopted by such other agency.

(3) There are no additional feasible mitigation measures which might avoid or reduce the significant environmental effects of the Project to a level that is less than significant because specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the Final EIR (refer to Section 6, Findings Regarding Project Alternatives, and to the Statement of Overriding Considerations).

Complete mitigation is not possible to avoid the significant adverse Project impacts related to conflict with or obstruction of the applicable air quality plan.

Facts in Support of Finding

The Project would be consistent with the majority of the applicable General Plan policies. However, the Project would exceed several South Coast Air Quality Management District (SCAQMD) emissions thresholds during construction and operation (see Threshold 4.3.2

below). Therefore, the Project would be partially inconsistent with two General Plan policies related to air quality. Because there is no feasible mitigation to reduce all the construction and operation air quality emissions to a less than significant level, there is no way to mitigate the partial inconsistency with the General Plan policies. Impacts related to the two General Plan policies are therefore considered to be significant unavoidable adverse impacts.

The Project has implemented all feasible mitigation measures as discussed further below under Threshold 4.3.2 and 4.7.1. The Project is consistent with relevant SCAG and ARB Scoping Plan strategies for reducing project emissions, as discussed in Response to Comment Nos. 8c and 9e, respectively.

As discussed in Response to Comment No. 9e, the ARB is the most appropriate agency to implement motor vehicle emission reductions. As discussed in Response No. 9f, the IID is implementing regional measures to reduce GHG emissions associated with electricity generation through its RPS, consistent with Executive Order S-14-08.

Reference: Final EIR, pages 4.3-13 – 4.3-14.

Finding

Threshold 4.3.2. Project construction and implementation would violate air quality standards or contribute substantially to an existing or projected air quality violation.

(1) All feasible changes, alterations and mitigation measures have been required in, or incorporated into the Final EIR that will avoid or substantially lessen the significant environmental effects with regards to air quality impacts. However, despite such measures, the impacts will still be significant.

(2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such agency or can and should be adopted by such other agency.

(3) There are no additional feasible mitigation measures which might avoid or reduce the significant environmental effects of the Project to a level that is less than significant because specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the Final EIR (refer to Section 6, Findings Regarding Project Alternatives, and to the Statement of Overriding Considerations).

Complete mitigation is not possible to avoid the significant adverse Project impacts related to violation of air quality standards.

Facts in Support of Finding

Construction

Construction activities would produce combustion emissions from various sources such as site grading, utility engines, onsite heavy-duty construction vehicles, asphalt paving, and vehicles transporting materials and construction crews. Buildout of the Specific Plan would occur over five phases. Construction equipment/vehicle emissions of reactive organic gases (ROGs), nitrogen oxides (NOX), and CO would exceed the SCAQMD emissions thresholds for each phase of the Project. Measures to reduce NOX and CO emissions consist principally of the use of Tier 3 and, when available, Tier 4 or greater diesel equipment, as identified in Mitigation Measure 4.3.2. However, even if all the construction equipment conformed to the United States Environmental Protection Agency (EPA) Tier 3 specification, it is not feasible to reduce the

significant levels of NOX and CO emissions to less than the SCAQMD daily thresholds. Therefore, Project construction would result in significant unavoidable adverse air quality impacts related to NOX and CO emissions.

Fugitive dust emissions would be generated as a result of land clearing, grading, and other exposure of soils to air/wind during Project construction. The Project would be required to comply with SCAQMD Rule 403 to control fugitive dust that would reduce the fugitive dust emissions during construction of each phase to below the SCAQMD thresholds.

The application of architectural coatings would result in a large amount of ROG emissions as the coatings are sprayed on and curing. Even with the application of architectural coatings using standard application techniques with a 25 percent transfer efficiency, emissions would be substantially more than the SCAQMD ROG threshold of 75 pounds per day (lbs/day). Measures to reduce ROG emissions include methods to increase the efficiency of applying architectural coatings. Even with compliance with Mitigation Measure 4.3.1 and the use of high-volume, low-pressure (HVLP) application techniques, it is not feasible to reduce the ROG emissions to below the 75 lbs/day SCAQMD threshold. There is no feasible mitigation that would reduce this exceedance to below the thresholds. Impacts would remain significant and unavoidable.

Operation

Long-term operational air emissions would be generated by stationary and mobile sources associated with the Project. Area sources may include architectural coatings, consumer products, and landscaping. Energy sources include natural gas consumption for heating and electricity for lighting in buildings and outdoor areas. Mobile sources include traffic on area roads. The anticipated residential and commercial uses would generate emissions from these types of sources during operation, with peak daily emissions exceeding the SCAQMD daily thresholds for ROGs, NOX, CO, particulate matter (PM) less than 10 microns in diameter (PM10), and PM less than 2.5 microns in diameter (PM2.5).

Mitigation Measure 4.3.3 requires the Project to comply with Title 24 of the California Code of Regulations (CCR) regarding energy conservation and green buildings standards. Although this would help reduce operational emissions, the majority of the emissions causing the exceedances would be from privately-owned vehicles operating as a result of the Project. There are no feasible mitigation measures available to the Project that would reduce the effect on emissions from private vehicles. As a result, there are no feasible mitigation measures to reduce the operational air quality impacts to a less than significant level. Impacts would remain significant and unavoidable.

Refer to Threshold 4.3.1 above regarding the role of the ARB and IID in reducing Project-related mobile emissions and energy-related emissions.

Reference: Final EIR, pages 4.3-14 – 4.3-22.

GEOLOGY AND SOILS

Finding

Threshold 4.6.1.i. Project implementation would potentially result in exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo

Earthquake Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault.

(1) All feasible changes, alterations and mitigation measures have been required in, or incorporated into the Final EIR that will avoid or substantially lessen the significant environmental effects with regards to geologic impacts from rupture of a known earthquake fault. However, despite such measures, the impacts will still be significant.

(2) There are no additional feasible mitigation measures which might avoid or reduce the significant environmental effects of the Project to a level that is less than significant because specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the Final EIR (refer to Section 6, Findings Regarding Project Alternatives, and to the Statement of Overriding Considerations).

Complete mitigation is not possible to avoid the significant adverse Project impacts related to rupture of a known earthquake fault.

Facts in Support of Finding

Portions of the Project site are located in an area with known and potentially active faults, including within a designated Alquist-Priolo Earthquake Fault Zone. The Project site and the surrounding areas are anticipated to experience strong ground shaking due to their proximity to the San Andreas Fault and other known active faults in the region. Several subsidiary faults located onsite are considered tectonically or potentially active. The Project design avoids development in areas of known fault zones, with the exception of residential structures planned in the Central Village. Mitigation Measure 4.6.1 requires that final geotechnical reports be prepared as each Tentative Tract Map is submitted in order to identify precise locations of onsite faults and requires compliance with the recommendations in the *Updated Geotechnical Fault Investigation Report* (Petra Geotechnical, Inc. 2007) and the *Preliminary Geotechnical Investigation* (Petra Geotechnical, Inc. 2013). Mitigation Measure 4.6.2 requires that all future development comply with the CBC and applicable seismic design standards. However, impacts from rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, cannot be ruled out. Therefore, due to the presence of the San Andreas Fault, even with incorporation of Mitigation Measures 4.6.1 and 4.6.2, the potential for significant unavoidable adverse impacts from fault rupture would still result with Project implementation.

Reference: Final EIR, page 4.6-11 – 4.6-13.

GLOBAL CLIMATE CHANGE

Finding

Threshold 4.7.1. Project implementation would result in an increase in greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

(1) All feasible changes, alterations and mitigation measures have been required in, or incorporated into the Final EIR that will avoid or substantially lessen the significant environmental effects with regards to generation of greenhouse gas emissions. However, despite such measures, the impacts will still be significant.

(2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such agency or can and should be adopted by such other agency.

(3) There are no additional feasible mitigation measures which might avoid or reduce the significant environmental effects of the Project to a level that is less than significant because specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the Final EIR (refer to Section 6, Findings Regarding Project Alternatives, and to the Statement of Overriding Considerations).

Complete mitigation is not possible to avoid the significant adverse Project impacts related to generation of greenhouse gas emissions.

Facts in Support of Finding

Construction

Project construction would generate greenhouse gases (GHGs) by the operation of construction equipment and from worker and vendor vehicles which typically involves the use of fossil-based fuels. The combustion of fossil-based fuels creates GHGs such as carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O).

Construction activities produce combustion emissions from various sources such as grading, utility engines, on-site heavy-duty construction vehicles, equipment hauling materials to and from the site, asphalt paving, and motor vehicles transporting the construction crew. Exhaust emissions from onsite construction activities would vary daily as construction activity levels change. Architectural coatings used in construction of the Project may contain volatile organic compounds (VOCs) that are similar to ROGs and are part of ozone (O_3) precursors. However, there are no significant emissions of GHGs from architectural coatings.

Operations

Long-term operation of the Project would generate GHG emissions from the proposed mix of residential and commercial land uses. Mobile source GHG emissions would include Project-generated vehicle trips associated with onsite facilities (internal and external to the Specific Plan Project site) and visitors to the Project site. Increases in stationary source emissions would also occur at offsite utility providers, as a result of increased demand for electricity, natural gas, and water. The GHG emissions generated by Project operations would exceed the SCAQMD-tiered interim GHG significance criteria for Tier 4. Therefore, even with mitigation, Project impacts related to GHG emissions would be significant and adverse.

The Project has implemented all feasible GHG mitigation measures, as discussed in detail in Response No. 9. As described in the Sustainability Features in Section 4.7.9, the proposed La Entrada Specific Plan encourages or promotes energy efficiency design techniques. These features are required mitigation measures to be incorporated into the design and construction of the project (including specific building projects). Energy minimization measures include:

- Energy Efficiency and Green Building Standards: The Project will exceed the most current Title 24 energy conservation and green building standards by 20 percent, and all new buildings will be designed to LEED GreenPoint Rated standard, or better

- 25% of all structures fitted with renewable energy features such as solar PV panels

- Drought tolerant landscaping, high-efficiency plumbing, and "smart" landscaping controls are required for all buildings, which will reduce GHG emissions associated with water system energy.
- Requirement that tract maps provide for shading within developed portions of sites and areas of pedestrian activity
- Land Use Design (minimize grading)
- VMT Reduction (walkability, mobility, NEV paths, bike/pedestrian paths, transit provision)
- Priority parking for electric, hybrid, and alternative fuel vehicles
- Solar orientation
- Energy efficient street lighting that provides a 10 percent reduction beyond the 2010 baseline energy use for this infrastructure
- Construction waste management plan (including 75% construction waste diversion)
- Vehicle idling limits
- Low Impact Development principles

In addition, Mitigation Measure 4.3.7 described in Section 4.3, Air Quality, would also reduce the project's GHG emissions. The Final EIR includes a modification to GHG Mitigation Measure 4.7.1 to require the applicant to provide educational material to residential and non-residential owners and tenants.

Refer to Threshold 4.3.1 discussion above, and Responses 9e and 9f, regarding the role of ARB and IID in reducing Project-related GHG emissions.

Reference: Final EIR, pages 4.7-19 – 4.7-26.

Finding

Threshold 4.7.2. Project implementation would result in a conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

(1) All feasible changes, alterations and mitigation measures have been required in, or incorporated into the Final EIR that will avoid or substantially lessen the significant environmental effects with regards to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. However, despite such measures, the impacts will still be significant.

(2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such agency or can and should be adopted by such other agency.

(3) There are no additional feasible mitigation measures which might avoid or reduce the significant environmental effects of the Project to a level that is less than significant because specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the Final EIR (refer to

Section 6, Findings Regarding Project Alternatives, and to the Statement of Overriding Considerations.

Complete mitigation is not possible to avoid the significant adverse Project impacts related to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Facts in Support of Finding

The Project would result in the generation of GHG emissions that would conflict with applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs. As a result, the Project would be considered to exceed Threshold 4.7.2 regarding conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases resulting in a significant unavoidable impact. In addition, because the Project would conflict with Threshold 4.7.2, Project climate change impacts with regard to GHG emissions would be considered cumulatively significant because they would contribute to GHG emissions that exceed the AB 32 Statewide goals. The implementation of Mitigation Measures 4.7.1 through 4.7.8 and 4.3.7 of the Final EIR would be implemented to reduce Project impacts relative to GHG emissions. The Project is also consistent with SCAG RTP/SCS strategies (see Response No. 8c), and applicable ARB Scoping Plan strategies (see Response 9 and Final EIR Table 4.7.C, pages 4.7-24 and 25). However, impacts would remain significant and unavoidable.

Refer to Threshold 4.3.1 discussion above, and Responses 9e and 9f, regarding the role of ARB and IID in reducing Project-related GHG emissions.

Reference: Final EIR, pages 4.7-26 – 4.7-27

PUBLIC SERVICES AND UTILITIES

Finding

Threshold 4.14.1. Project implementation would result in impacts to fire protection services.

(1) All feasible changes, alterations and mitigation measures have been required in, or incorporated into the Final EIR that will avoid or substantially lessen the significant environmental effects with regards to fire protection services. However, despite such measures, the impacts will still be significant.

(2) There are no additional feasible mitigation measures which might avoid or reduce the significant environmental effects of the Project to a level that is less than significant because specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the Final EIR (refer to Section 6, Findings Regarding Project Alternatives, and to the Statement of Overriding Considerations).

Complete mitigation is not possible to avoid the significant adverse Project impacts related to fire protection services.

Facts in Support of Finding

Project development would result in an estimated future population of approximately 35,958 residents on the Project site, which would increase demand on existing fire facilities and may

affect response times. The two existing fire stations expected to serve the Project would not be able to accommodate the total increase in demand for fire services at Project buildout.

The Project design includes three above-ground storage tanks and infrastructure to provide fire flow to all areas of the site. All future residences would be equipped with fire protection sprinkler systems, and the Project applicant would be required to pay Fire Impact Fees to fund future fire facilities to serve the Project. The Project design also provides a site for future development of a fire station. However, construction of the fire station is not part of the Project, nor can the Project guarantee ongoing funds to operate a new fire station.

No feasible mitigation measures are available to reduce Project impacts on fire protection services to a level of less than significant. Therefore, the Project would result in significant adverse unavoidable interim impacts to existing fire services until the proposed fire station is constructed and operational. Subsequent to the opening of the operational fire station, Project impacts related to fire services and facilities would be considered less than significant.

Reference: Final EIR, pages 4.14-15 – 4.14-16.

Finding

Threshold 4.14.2. Project implementation would result in impacts to police protection services.

(1) All feasible changes, alterations and mitigation measures have been required in, or incorporated into the Final EIR that will avoid or substantially lessen the significant environmental effects with regards to police protection services. However, despite such measures, the impacts will still be significant.

(2) There are no additional feasible mitigation measures which might avoid or reduce the significant environmental effects of the Project to a level that is less than significant because specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the Final EIR (refer to Section 6, Findings Regarding Project Alternatives, and to the Statement of Overriding Considerations).

Complete mitigation is not possible to avoid the significant adverse Project impacts related to police protection services.

Facts in Support of Finding

The Project would generate an estimated 35,958 new residents on the Project site at buildout, and therefore, would increase demand on existing police facilities and services and may increase response times. The Project design reserves a site in Phase 2 for the future development of a police station. However, the Project does not include the construction of the station, nor can the Project guarantee ongoing funds to operate a new fire station.

No feasible mitigation measures are available to reduce Project impacts on police protection services to a less than significant level. Therefore, there would be a significant adverse unavoidable interim impact during construction and operation of the Project to existing police protection services until the proposed police station is constructed and operational. Subsequent to the opening of the police station, impacts to police facilities would be considered less than significant.

Reference: Final EIR, pages 4.14-16 – 4.14-17.

Finding

Threshold 4.14.4. Project implementation would result in impacts to library facilities.

(1) All feasible changes or alterations have been required in, or incorporated into the Final EIR that will avoid or substantially lessen the significant environmental effects with regards to library facilities. However, despite such measures, the impacts will still be significant.

(2) There are no additional feasible mitigation measures which might avoid or reduce the significant environmental effects of the Project to a level that is less than significant because specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the Final EIR (refer to Section 6, Findings Regarding Project Alternatives, and to the Statement of Overriding Considerations).

Complete mitigation is not possible to avoid the significant adverse Project impacts related to Project impacts on library facilities.

Facts in Support of Finding

According to City standards for library services, the Project would result in the need for an additional 17,979 square feet of library space and 43,150 library materials (35,958 * 1.2 = 43,150). Therefore, the Project would result in increased demand for library square footage and materials during each phase of construction that would exceed the City's existing library facilities. The applicant would be required to pay Library Impact Fees based on the number of dwelling units proposed in each phase, consistent with requirements in the City's Municipal Code. Such fees would be used for the land acquisition and construction costs of new public libraries throughout the City. Although the Project would include several design features and would pay Library Impact Fees that would reduce impacts to existing library facilities, the increase in population associated with Project buildout would result in the need for additional library facilities and library materials that would not be accommodated by the Project development. Other revenue from the Project, including direct and indirect revenue associated with sales tax, property tax and other sources, would accrue to the City's General Fund which could be used to provide additional library facilities.

No feasible mitigation measures are available to reduce Project impacts on library facilities to a less than significant level. Therefore, Project impacts would remain significant and unavoidable adverse impacts until future library facilities are constructed.

Reference: Final EIR, page 4.14-20.

Finding

Threshold 4.14.10. Project implementation would result in a determination by the wastewater treatment provider that serves or may serve the Project that it has inadequate capacity to serve the Project's demand in addition to the provider's existing commitment.

(1) All feasible changes, mitigation measures or alterations have been required in, or incorporated into the Final EIR that will avoid or substantially lessen the significant environmental effects with regards to wastewater treatment services. However, despite such measures, the impacts will still be significant.

(2) There are no additional feasible mitigation measures which might avoid or reduce the significant environmental effects of the Project to a level that is less than significant because specific economic, legal, social, technological, or other considerations make

infeasible the mitigation measures or alternatives identified in the Final EIR (refer to Section 6, Findings Regarding Project Alternatives, and to the Statement of Overriding Considerations).

Complete mitigation is not possible to avoid the significant adverse Project impacts related to provision of adequate wastewater treatment services.

Facts in Support of Finding

Wastewater generated with Project development would be handled by the Coachella Sanitary District (CSD) and conveyed to the City's WWTP. The Project sewer system would be constructed in phases as each phase of the Project is implemented. The WWTP would require expansion to accommodate the Project before complete buildout of the Specific Plan area. Depending on the progress of other land development in the City and whether/when the capacity of the WWTP has been expanded, the City may need to expand the WWTP or make other changes to its wastewater treatment system to accommodate the Project development that occurs after 60 percent buildout of the Specific Plan. Mitigation Measure 4.14.1 would reduce potential wastewater treatment capacity impacts associated with the later Project phases to a less than significant level. The Specific Plan would also be conditioned to pay all applicable development impact fees related to sewer infrastructure and to construct all associated sewer lines and infrastructure needed to serve the Project site. However, no feasible mitigation measures are available to reduce Project impacts on available wastewater treatment services to a level of less than significant. Therefore, Project impacts would remain significant and unavoidable.

Reference: Final EIR, pages 4.14-26 – 4.14-29.

Finding

Threshold 4.14.11. Project implementation would result in insufficient permitted capacity of a landfill able to accommodate the Project's solid waste disposal needs.

(1) All feasible changes, mitigation measures or alterations have been required in, or incorporated into the Final EIR that will avoid or substantially lessen the significant environmental effects with regards to solid waste disposal services. However, despite such measures, the impacts will still be significant.

(2) There are no additional feasible mitigation measures which might avoid or reduce the significant environmental effects of the Project to a level that is less than significant because specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the Final EIR (refer to Section 6, Findings Regarding Project Alternatives, and to the Statement of Overriding Considerations).

Complete mitigation is not possible to avoid the significant adverse Project impacts related to provision of solid waste disposal services.

Facts in Support of Finding

At buildout, the Project would generate approximately 91 tons of solid waste per day, which would represent approximately two and three percent of the maximum daily permitted capacity of the Badlands and Lamb Canyon Sanitary Landfills, respectively. These Landfills are anticipated to close prior to Project buildout. Although it is anticipated that solid waste generated by the Project would be routed to these two Landfills prior to their closure, the Riverside Countywide Integrated Waste Management Plan does not identify where solid waste

generated in the City of Coachella would go after these Landfills are closed. Therefore, subsequent to the closure of these Landfills, the Project would have a significant adverse impact related to solid waste. However, the County of Riverside is responsible for providing regional solid waste management solutions such as landfills (and is currently in the process of seeking approvals to expand its regional composting facility located just outside the City of Coachella, as noted in the Errata to the Responses to Comments). As no feasible mitigation measures are available to reduce Project impacts to a level of less than significant, such impacts relative to solid waste disposal would remain significant and unavoidable.

Reference: Final EIR, pages 4.14-30 – 4.14-31.

TRAFFIC AND CIRCULATION

Finding

Threshold 4.16.1. Project implementation would conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system.

(1) All feasible changes, mitigation measures or alterations have been required in, or incorporated into the Final EIR that will avoid or substantially lessen the significant environmental effects with regards to potential conflicts with plans, ordinances, or policies for measuring performance of the circulation system. However, despite such measures, the impacts will still be significant.

(2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such agency or can and should be adopted by such other agency.

(3) There are no additional feasible mitigation measures which might avoid or reduce the significant environmental effects of the Project to a level that is less than significant because specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the Final EIR (refer to Section 6, Findings Regarding Project Alternatives, and to the Statement of Overriding Considerations).

Complete mitigation is not possible to avoid the significant adverse Project impacts related to conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system.

Facts in Support of Finding

Implementation of the proposed Project would result in the generation of traffic that would adversely affect a number of roadways and intersections within the Project vicinity, as specifically identified in Section 4.16, *Traffic and Circulation*, of the Final EIR. Mitigation is proposed to reduce potential impacts of the Project to the extent feasible. However, even with implementation of Mitigation Measures 4.16.1 through 4.16.5, the Project would result in significant unavoidable adverse traffic impacts to intersections outside of the City's jurisdiction. As the City cannot control the timing of improvements that are not fully within its own jurisdiction, such impacts cannot be fully mitigated, and therefore, remain significant and unavoidable. For this reason, local intersection improvements wholly or partly in the City of Indio or Riverside County and local intersection improvements also wholly or partly on State facilities (i.e., State Route 111 [SR-111], State Route 86 [SR-86], and I-10) cannot be controlled by the City. Therefore, there is no feasible mitigation for impacts to the affected intersections and freeway locations identified in Section 4.16.7 of the Final EIR during the Existing Plus Phases 1

through 4; Existing Plus Project Buildout; and, Cumulative Year 2035 Plus Project Buildout scenarios.

Refer to Response No. 7d regarding the County of Riverside's role in mitigating intersections in unincorporated Riverside County.

It should however be noted that the Project is consistent with the City's General Plan. Therefore, the associated land uses have been included in the regional transportation planning efforts conducted by SCAG, Riverside County and CVAG, as well as Citywide transportation planning efforts of the City.

Reference: Final EIR, pages 4.16-10 – 4.16-15.

Finding

Threshold 4.16.2. Project implementation would conflict with an applicable congestion management program established by the county congestion management agency for designated roads or highways.

(1) All feasible changes, mitigation measures or alterations have been required in, or incorporated into the Final EIR that will avoid or substantially lessen the significant environmental effects with regards to potential conflict with congestion management programs. However, despite such measures, the impacts will still be significant.

(2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such agency or can and should be adopted by such other agency.

(3) There are no additional feasible mitigation measures which might avoid or reduce the significant environmental effects of the Project to a level that is less than significant because specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the Final EIR (refer to Section 6, Findings Regarding Project Alternatives, and to the Statement of Overriding Considerations).

Complete mitigation is not possible to avoid the significant adverse Project impacts related to conflict with congestion management programs.

Facts in Support of Finding

The Congestion Management Program (CMP) uses level of service (LOS) E as the LOS standard. The Project intersection impact analyses were conducted using the more restrictive LOS D standard from the local jurisdiction in which each intersection is located. As result, the analyses in this EIR meet and exceed the CMP LOS standard for intersection analyses, resulting in a less than significant impact. No additional mitigation is required.

The CMP utilizes a LOS standard of LOS E, except for non-exempt locations where the standard is LOS F. The Project intersection impact analysis is based on the more restrictive LOS D. The analysis of freeway mainline lanes and merge/diverge locations is based on the CMP LOS E standard. Thus, this EIR meets and exceeds the CMP LOS standard for intersection analyses and meets the CMP LOS standard for freeway mainline lanes and merge/diverge locations.

Three study area intersections on SR-111, SR-86, or I-10 are forecast to operate at less than the CMP LOS E standard in the existing baseline plus Project conditions. Because the proposed

Project causes the LOS to fall below the standard or causes further degradation at these intersections, this is considered to be a Project direct significant impact and mitigation is required. Mitigation Measure 4.16.1 would reduce the significant impacts. However, the City cannot control the timing of when the intersection improvements for the locations on Caltrans facilities (i.e., SR-111, SR-86, and I-10) are implemented. Even with implementation of Mitigation Measure 4.16.1, impacts would remain significant and unavoidable at these locations.

Six study area intersections on SR-111, SR-86, or I-10 are forecast to operate at less than the CMP LOS E standard in the existing baseline plus Project build-out (with the Avenue 50 Interchange) conditions. Because the proposed Project causes the LOS to fall below the standard or causes further degradation at these intersections, this is considered to be a Project direct significant impact and mitigation is required. Mitigation Measure 4.16.2 would reduce the significant impacts. However, the City cannot control the timing of when the intersection improvements for the locations on Caltrans facilities (i.e., SR-111, SR-86, and I-10) are implemented. Even with implementation of Mitigation Measure 4.16.2, impacts would remain significant and unavoidable at these locations.

Three study area freeway mainline lanes are forecast to operate at less than the CMP LOS E standard in existing baseline plus Project buildout (with the Avenue 50 Interchange) conditions. Because the proposed Project causes the LOS to fall below the CMP standard at these freeway mainline lanes, this is considered to be a Project direct significant impact and mitigation is required. However, there is no feasible mitigation for this significant impact because there is no mechanism for the City to design, fund, and construct improvements on State highways and freeways. All improvements to State highways and freeways are controlled by Caltrans. Impacts would remain significant and unavoidable at these locations.

Four study area freeway ramp merge/diverge locations are forecast to operate at less than the CMP LOS E standard (the same standard used in Threshold 4.16.1 for freeway mainline lanes and merge/diverge locations) in existing baseline plus Project build-out (with the Avenue 50 Interchange) conditions. Because the proposed Project causes the LOS to fall below the standard at these freeway merge/diverge locations, this is considered to be a Project direct significant impact and mitigation is required. However, there is no feasible mitigation for this significant impact because there is no mechanism for the City to design, fund, and construct improvements on State highways and freeways. Impacts would remain significant and unavoidable at these locations.

There are 18 study area intersections that are forecast to operate at less than the CMP LOS E standard with Year 2035 plus Project traffic. However, the forecast intersection LOS deficiencies are caused by future traffic volume growth from the combination of traffic volume increases projected by the traffic model that are attributable to other cumulative projects and the traffic volume increases from the proposed Project. For this reason, these impacts represent a significant cumulative impact, and mitigation is required. Mitigation Measures 4.16.3 and 4.16.4 would reduce the significant impacts by requiring the Project's fair share contribution in the form of Development Impact Fee (DIF) and Transportation Uniform Mitigation Fee (TUMF) payments towards the future intersection improvements. However, the City cannot control the timing of when the intersection improvements for the locations on Caltrans facilities (i.e., SR-111, SR-86, and I-10) are implemented. Even with implementation of Mitigation Measures 4.16.3 and 4.16.4, cumulative impacts would remain significant and unavoidable at these locations.

There are 22 study area freeway mainline lanes forecast to operate at less than the CMP LOS E standard with Year 2035 plus Project traffic. However, the forecast freeway mainline LOS

deficiencies are caused by future traffic volume growth from the combination of traffic volume increases projected by the traffic model that are attributable to other cumulative projects and the traffic volume increases from the proposed Project. These impacts represent a significant cumulative impact, and mitigation is required. However, there is no feasible mitigation for this significant impact because there is no mechanism for the City to design, fund, and construct improvements on State highways and freeways. All improvements to State highways and freeways are controlled by Caltrans. Impacts would remain significant and unavoidable at these locations.

There are 22 study area freeway merge/diverge locations forecast to operate at less than the CMP LOS E standard with Year 2035 plus Project traffic. However, the forecast freeway ramp merge/diverge location LOS deficiencies are caused by future traffic volume growth from the combination of traffic volume increases projected by the traffic model that are attributable to other cumulative projects and the traffic volume increases from the proposed Project. These impacts represent a significant cumulative impact, and mitigation is required. However, there is no feasible mitigation for this significant impact because there is no mechanism for the City to design, fund, and construct improvements on State highways and freeways. All improvements to State highways and freeways are controlled by Caltrans. Impacts would remain significant and unavoidable at these locations.

Refer to Response No. 7d regarding the County of Riverside's role in mitigating intersections in unincorporated Riverside County.

Reference: Final EIR, pages 4.16-16 – 4.14-18.

6.0 FINDINGS REGARDING CUMULATIVE IMPACTS

As determined in Section 4.0, *Existing Environmental Setting, Environmental Analysis, Impacts, and Mitigation Measures*, of the Final EIR, the Project would result in a "cumulatively considerable" contribution to cumulative impacts with regards to aesthetics, air quality, agricultural resources, geology and soils, global climate change, public services and utilities, and traffic impacts. The remaining environmental issues areas would not result in a "cumulatively considerable" contribution to cumulative impacts as summarized further below.

AESTHETICS

Finding

Project implementation would result in cumulative impacts to aesthetics. There are no additional feasible mitigation measures to reduce impacts associated with a change in visual character to a less than significant impact.

Facts in Supporting Finding

As illustrated by Figures 4.1.6 through 4.1.9 on pages 4.1-34 through 4.1-41 of the DEIR, the Project site would change from a largely undeveloped condition characterized by vacant desert terrain to a master-planned community. The overall visual character of the Project site would be substantially altered with development of the Project site. While the existing character of the Project site would be substantially changed compared to existing conditions, the site design (including grading), landscaping, open space preservation, and architectural design would adhere to design guidelines established in the La Entrada Specific Plan which are intended to

avoid, reduce, offset, or otherwise minimize identified potential adverse impacts of the proposed Project or provide significant benefit to the community and/or to the physical environment. In addition, Standard Condition 4.1.1 requires architectural review of Project plans as each Tentative Tract Map and/or Site Plan is submitted. Despite incorporation of Project Design Features, the Specific Plan grading plans, and adherence to Standard Condition 4.1.1, impacts related to the change in visual character would be significant and unavoidable as no feasible mitigation is available to reduce impacts to visual character. Compliance with the Hillside Development Guidelines, if adopted in the future by the City, would not be sufficient to reduce those significant and unavoidable impacts related to visual character.

Although the Project would result in a cumulatively considerable contribution to nighttime lighting conditions given that the Project site and surrounding areas do not currently emit substantial amounts of nighttime light, there are no adjacent sensitive land uses that would be adversely impacted by the introduction of those new light sources and glare. Therefore, the proposed Project would not contribute to a cumulatively significant impact to viewsheds, visual character, or lighting and glare.

The Project is generally consistent with the City and County General Plan EIRs from an overall land use plan, type and density basis, and as such the cumulative impacts of the Project have been factored into the City and County General Plan EIRs. The City and County General Plan EIRs are a more appropriate tool for addressing and mitigating cumulative impacts to aesthetics.

Reference: Final EIR, pages 4.1-23 and 4.1-24.

AGRICULTURAL AND FORESTRY RESOURCES

Finding

Project construction and implementation would result in cumulative impacts to agricultural resources. There are no feasible mitigation measures to reduce impacts associated with permanent conversion of agricultural land.

Facts in Supporting Finding

In 2011, Riverside County generated approximately $1.28 billion of revenue value associated with agricultural operations and products[2]. In addition, the City has identified agriculture as a valuable resource on which the local economy is dependent. Even with City policies aimed at discouraging the conversion of farmland, as the area continues to develop and populate in the future, the development pressure on agricultural lands is anticipated to increase. Although the loss of approximately 9.5 acres is relatively small (less than 1/100 of a percent) compared to the total agricultural land in the City (21,840 ac), the loss would be permanent and would contribute to an overall loss of agricultural resources in the City. Since there is no feasible mitigation for this loss (refer to Threshold 4.2.1 above), the proposed Project's contribution to the cumulative loss of valued agricultural lands countywide is considered an unavoidable and significant impact on a cumulative basis.

The Project is generally consistent with the City and County General Plan EIRs from an overall land use plan, type and density basis, and as such the cumulative impacts of the Project have

[2] *Total Valuation – F.O.B.,* Riverside County Agricultural Production Report, Riverside County Agricultural Commissioner's Office, 2011.

been factored into the City and County General Plan EIRs. The City and County General Plan EIRs are a more appropriate tool for addressing and mitigating cumulative impacts to agricultural resources.

Reference: Final EIR, Section 4.2 pages 15 - 16

AIR QUALITY

Finding

Project construction and implementation would result in a cumulatively considerable net increase of any criteria pollutant with the implementation of mitigation measures (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program, and Threshold 4.3.2 above).

Facts in Support of Finding

Construction

During construction, the proposed Project would temporarily contribute criteria pollutants to the area above the SCAQMD thresholds. Other projects in the area may be under construction at the same time as the proposed Project. Each Project would be required to comply with the SCAQMD's standard construction measures required in Rule 403. However, because the proposed Project itself would result in a significant adverse air quality impact during construction related to ROG, NOX, and CO that cannot be mitigated to below a level of significance, it would also potentially contribute to a significant short-term cumulative adverse air quality impact in the Project area. Because there is no feasible mitigation available to reduce the construction-related ROG, NOX, and CO impacts of the Project to below a level of significance, there is no mitigation that would reduce the Project contribution to cumulative short-term adverse air quality impacts to below a level of significance. Therefore, construction air quality impacts are considered cumulatively significant.

Operation

As stated in Section 4.16, Traffic and Circulation, of the DEIR, the traffic analysis for the Project is a cumulative impacts assessment because the traffic model forecasts total traffic based on known cumulative projects and the City's General Plan. Because this air quality impact analysis uses this same cumulative traffic data, it also assesses cumulative impacts. As stated in Section 4.3.6 of the DEIR, operation of the proposed Project would result in emissions of ROG, NO_x, CO, PM_{10}, and $PM_{2.5}$ that exceed SCAQMD daily thresholds. Even with implementation of Mitigation Measures 4.3.1 through 4.3.8, impacts would remain significant and unavoidable. Therefore, operational air quality impacts are considered cumulatively significant.

As noted in Threshold 4.3.2, the ARB and IID are responsible for implementing cumulative air quality mitigation.

Reference: Final EIR, pages 4.3-28 through 4.3-32.

BIOLOGICAL RESOURCES

Finding

Project construction and implementation would not result in cumulative impacts to biological resources with the implementation of mitigation measures (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

Facts in Support of Finding

Because the proposed Project and the cumulative projects in the Coachella Valley are required to comply with the Coachella Valley MSHCP, and the Coachella MSHCP and its associated EIR/EIS[3] have analyzed cumulative impacts within the region of the proposed Project under CEQA, NEPA, CESA, and FESA, cumulative impacts to biological resources associated with the proposed Project have been previously considered and analyzed. It was determined in the EIR/EIS that cumulative impacts to biological resources would be less than significant through the implementation of the Coachella Valley MSHCP. The proposed Project and any other future public or private projects are subject to Coachella Valley MSHCP compliance including the payment of fees, which helps cover the cost of acquiring habitat and implementing the Coachella Valley MSHCP and, therefore, any cumulative impacts on biological resources are less than significant.

Additionally, implementation of Mitigation Measures 4.4.1 through 4.4.7 would reduce Project level impacts to a less than significant level.

Reference: Final EIR, page 4.4-19 through 4.4-25.

CULTURAL AND PALEONTOLOGICAL RESOURCES

Finding

Project construction would not result in cumulative impacts to cultural and paleontological resources with the implementation of mitigation measures (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

Facts in Support of Finding

Future development in the City could include excavation and grading that could potentially impact archaeological and paleontological resources and human remains. The cumulative effect of the proposed Project is the continued loss of these resources. The proposed Project, in conjunction with other development in the City, has the potential to cumulatively impact archaeological and paleontological resources. However, each development proposal received by the City undergoes environmental review pursuant to CEQA. If there is a potential for significant impacts to archaeological or paleontological resources, an investigation is required to determine the nature and extent of the resources and identify appropriate mitigation measures.

Projects are required to comply with the City's General Plan policies as appropriate to reduce the effects of additional development within the City. Mitigation Measures 4.5.1 through 4.5.4 would be implemented during construction of Phase 1 of the La Entrada Specific Plan Project to

[3] Final Recirculated Coachella Valley MSHCP Environmental Impact Report/Statement, prepared by Coachella Valley Association of Governments, September 2007.

reduce potential Project impacts by ensuring avoidance, evaluation, and, as applicable, scientific recovery and study of any resources encountered.

Mitigation Measure 4.5.5 would be implemented, in addition to Measures 4.5.1 through 4.5.4, for all Project construction after Phase 1 on the rest of the Specific Plan site. Therefore, with implementation of Mitigation Measures 4.5.1 through 4.5.5, the contribution of the Specific Plan to the cumulative loss of known and unknown cultural resources throughout the City would be reduced to below a level of significance.

Reference: Final EIR, pages 4.5-23 through 4.5-29.

GEOLOGY AND SOILS

Finding

Project construction would not result in cumulative impacts with regards to geology, soils and seismicity with the implementation of mitigation measures (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

Facts in Support of Finding

The Project site is located within an Alquist-Priolo Earthquake Fault Hazard Zone and contains several potentially active faults. Additionally, the Project site contains areas of potentially expansive soils and is located on a geologic formation that is susceptible to both landslides and lateral spreading. As such, the proposed Project would be required to implement Mitigation Measures 4.6.1 through 4.6.5 and comply with applicable State and local requirements, including but not limited to the City of Coachella Building Code and the CBC. Seismic impacts are a regional issue, and all projects must adhere to applicable seismic codes and design standards. The proposed Project's individual impacts related to geotechnical constraints are considered significant even after mitigation from fault rupture. Therefore, the Project's contribution to regional cumulative impacts regarding fault rupture is considered potentially significant. However, implementation of the recommended Project-level mitigation, plus standard mitigation imposed by the City and County on future development in the surrounding area, would result in less than significant cumulative impacts related to geotechnical and soil constraints.

Reference: Final EIR, page 4.6-24.

GLOBAL CLIMATE CHANGE

Finding

Project construction would result in cumulative impacts to global climate change with the implementation of mitigation measures (refer to Project Resolution Attachment "B", Mitigation Monitoring and Reporting Program).

Facts in Support of Finding

While the proposed Project includes Project Design Features and Sustainability Features, it would still generate significant amounts of GHG emissions. Mitigation Measures 4.7.1 through 4.7.8 are prescribed to further reduce the proposed Project's GHG emissions. However, estimated GHG emissions with mitigation reductions would remain above the Tier 4 targets. As a result of the significant amount of GHG emissions, the proposed Project would conflict with

applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs. As a result, the Project's climate change impacts with regard to GHG emissions would be considered cumulatively significant because they would contribute to GHG emissions that exceed the AB 32 statewide goals.

As noted in Threshold 4.3.2, the ARB and IID are responsible for implementing cumulative GHG mitigation.

Reference: Final EIR, pages 4.7-29 through 4.7-31.

HAZARDS AND HAZARDOUS MATERIALS

Finding

Project construction and implementation would not result in cumulative impacts associated with hazards and hazardous materials with the implementation of mitigation (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

Facts in Support of Finding

Project construction would involve the routine use of hazardous materials, including fuels, paints, and solvents. However, the amount of these materials during construction would be limited and regulated. Mitigation Measures 4.8.1 and 4.8.2 address the potential encounter to onsite unknown hazards or hazardous substances during Project construction. Therefore, impacts related to hazardous materials in soils, groundwater, and use of hazardous materials on site would be regulated through implementation of both Mitigation Measures 4.8.1 and 4.8.2. Therefore, the proposed Project's contribution to hazards and hazardous materials cumulative impacts would be less than significant with the implementation of these mitigation measures.

The proposed Project, when considered with other cumulative projects, may be subject to risks associated with wildland fires as a result of the natural open space. It is anticipated that future development will comply with the City Wildland Fire Plan, and the City and County Fire Code, both of which address fire prevention, and would be applicable to wildland fires. In addition, in the event of an emergency, the County and the City maintain Emergency Operations Plan to respond to any emergencies. As a result, the proposed Project's contribution to cumulative impacts associated with exposure of people or structures to a significant risk of loss, injury, or death involving wildland fires would not be considered cumulatively considerable, and the impact would be less than significant.

Reference: Final EIR, pages 4.8-13 through 4.8-14.

HYDROLOGY AND WATER QUALITY

Finding

Project implementation would not result in cumulative impacts associated with hydrology or water quality impacts with the implementation of mitigation (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

Facts in Support of Finding

Each of the cumulative projects, individually and cumulatively, could potentially increase the volume of storm water runoff and contribute to pollutant loading in storm water runoff reaching

both the City's storm drain system and the Whitewater River, resulting in cumulative impacts to hydrology and surface water quality. However, as with the proposed Project, each of the cumulative projects would also be subject to NPDES and MS4 Permit requirements for both construction and operation. Each Project would be required to develop a SWPPP and WQMPs and would be evaluated individually to determine appropriate BMPs to minimize impacts to surface water quality. In addition, the City Department of Public Works reviews all development projects on a case-by-case basis to ensure that sufficient local and regional drainage capacity is available. Thus, the Project's contribution to cumulative impacts to hydrology and water quality would be less than significant.

Reference: Final EIR, page 4.9-24.

LAND USE AND PLANNING

Finding

Implementation of the Project would not result in cumulative land use impacts.

Facts in Support of Finding

Implementation of the proposed Project, when considered in conjunction with other existing and planned developments in the Project area, would result in the development of a currently vacant and undeveloped site. The cumulative study area analyzed for potential land use impacts is the City of Coachella and the City's SOI.

The 1,612 ac portion of the Project site located in the City is currently designated as "Specific Plan," which allows for Low-Density Residential (R-L), Entertainment Commercial (C-E), General Commercial (C-G), and Open Space (O-S) uses, and the 588 ac portion located within the City's SOI and General Plan planning area is pre-designated for Low-Density Residential (RDL) and Open Space (O-S). However, because this portion of the Project site is also located in an unincorporated area of the County, this area is currently designated for Agricultural (A-G) use on the County's General Plan Land Use Map. Development of the proposed Project would be consistent with the City's General Plan land use designations due to the fact that the proposed Project would be incorporated into the City's General Plan as part of the current General Plan update process. However, in the event that the proposed Project is approved before the General Plan is updated, a GPA and Zone Change would be required to include the La Entrada Specific Plan boundaries and proposed land uses on the City's General Plan Land Use Diagram and Zoning Map, thus making the proposed Project consistent with the City's General Plan and Zoning Map. Approval of the proposed Project would ensure that the La

Entrada Specific Plan, in conjunction with the Coachella General Plan, would be the guiding land use policy documents for the Project area. As such, implementation of the proposed Project would not result in significant land use compatibility issues within the City's jurisdiction.

Reference: Final EIR, pages 4.10-13 through 4.10-14.

MINERAL RESOURCES

Finding

Project implementation would not result in cumulative impacts to known mineral resource that would be of value to the region and the residents of the State.

Facts in Support of Finding

The Project site is located within MRZ-3, which indicates that the Project site contains aggregate mineral resources. Although implementation of the proposed Project would result in minor impacts associated with the loss of availability of sand and gravel resources on the Project site, sand and gravel resources are available elsewhere in the Coachella Valley and Southern California. In addition, the proposed Project would not result in the loss of availability of a locally important mineral resource recovery site. Therefore, because the proposed Project is not anticipated to contribute to a significant cumulative impact to a mineral resource that is located within a designated MRZ or other known mineral resources in the area.

Reference: Final EIR, page 4.11-4.

NOISE

Finding

Construction and Project implementation would result in cumulative impacts associated with noise impacts with the implementation of mitigation (refer to Project Resolution Attachment "B" Mitigation Monitoring and Reporting Program).

Facts in Support of Finding

Construction-related noise impacts would be mitigated through implementation of Mitigation Measures 4.12.1, compliance with standard noise reductions and adherence to the City's specified construction hours. Since every Project within the City's limits is required to comply with the Municipal Code Chapter 7.04 noise control ordinance requirements, including the construction hours restrictions, the proposed Project design features would ensure that Project-related construction activities comply with these requirements and therefore would reduce the potential construction noise impacts to a less than significant level.

Potential noise generated by the Project components during operation such as machinery associated with commercial facilities would be managed through implantation of Project design features that comply with City noise standards in addition to Mitigation Measures 4.12-2 and 4.12-3. Sound walls are recommended to reduce the traffic noise levels in the outdoor active use areas to 60 dBA CNEL or lower to meet the City's exterior noise standard of 60 dBA CNEL. To achieve the interior noise level standard, building facade enhancements and mechanical ventilation (air conditioning) were identified to reduce the exterior noise inside the dwelling units to meet the 45 dBA CNEL interior noise standard. All measures specified are typically the minimum that would be required to meet these noise standards and therefore reduce noise to a level that is less than significant. With more building upgrades, the interior noise would be reduced even more. However, the associated cost would also be greater. Therefore, the proposed Project's contribution to cumulative noise impacts would be considered less than significant.

Reference: Final EIR, pages 4.12-24 and 4.12-25.

POPULATION AND HOUSING

Finding

Project implementation would not result in cumulative impacts to population and housing.

Facts in Support of Finding

SCAG projects the City population to increase to 128,700 persons by 2035. Similarly, SCAG projects City employment to increase to 27,900 jobs by 2035 and the County employment to increase to 1,243,000 jobs by 2035. The Project includes development of a variety of uses including residential, commercial, and office uses and would potentially increase employment in the City by 3,355 employees and its population by 35,958 people. The proposed Project together with other commercial and residential developments within the City will serve an existing demand for employment, while also meeting the cumulative demand of employment that will result from the City's projected future population. These increases for population, housing, and employment would be within the total projected growth forecasts for 2035. In addition, implementation of the proposed Project would be consistent with the City's vision of the Project site because the existing General Plan designation for the site is "Specific Plan." Implementation of the proposed Project would not result in a cumulatively significant population or housing impact and the proposed Specific Plan land uses would not significantly induce growth in areas where growth was not previously anticipated.

Reference: Final EIR, page 4.13-12.

PUBLIC SERVICES AND UTILITIES

Finding

Project implementation would result in long- and short-term cumulative impacts to public services and utilities.

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessens the significant environmental effect as identified in the Final EIR, however, impacts with regards to solid waste and wastewater would remain significant.

Facts in Support of Finding

Fire Protection. RCFD anticipates cumulative demand in order to plan for overall service. Although the RCFD is currently meeting its response time objectives, it is anticipated that there would be an overall increased demand for fire protection services as a result of Project build out. Therefore, the proposed Project would result in a need for new fire facilities. The proposed Project would reserve a site within the Central Village that would accommodate the future development of a fire station. Therefore, development of this fire station would reduce the proposed Project's cumulative impact on fire facilities to less than significant levels. Furthermore, payment of Fire Facility Impact Fees would reduce long-term impacts to fire facilities to less than significant levels. However, even with the development of the proposed fire station and payment of impact fees, the Project impacts to fire services would temporarily be cumulatively considerable.

Police Protection. The CPD currently contracts with the RCSD to provide service to the City. RCSD anticipates cumulative demand in order to plan for overall service. Neither the CPD nor the RCSD are currently meeting their staffing objectives. Accordingly, the proposed Project has been designed to provide a site for a future police station during Phase 2. Development of the proposed police station would reduce the proposed Project's impact on police services to a less than significant level. In addition, payment of the Police Impact Fees would reduce the proposed Project's long-term impacts to a less than significant level. However, even with the development of the proposed police station and payment of Police Impact Fees, the proposed Project's contribution to cumulative impacts would temporarily be cumulatively considerable.

Public Schools. As indicated by the CVUSD, schools within the CVUSD are currently over capacity. In addition, the proposed Project would result in a substantial population increase that would generate approximately 5,837 new students. The proposed Project has been designed to provide sites for the development of three elementary schools and one middle school that would accommodate Project-related increases in student enrollment. Until these schools are built in Phases 2 and 3, the proposed Project would result in an increased demand on existing school facilities within the CVUSD. In addition, the proposed Project would not include the development of a high school to accommodate the 1,575 high school students generated at Project build out. Therefore, Project development would lead to an increased demand on existing high school educational facilities. However, although payment of School Impact Fees, which would provide for the future development of school facilities and the development of the proposed schools, would mitigate long-term impacts related to school facilities, the proposed Project would result in cumulatively considerable short-term impacts to school facilities until the new schools are constructed and operational.

Library Services. The RCL requires 0.5 square feet and 1.2 library materials per resident to meet library service demands within the County. The proposed Project would generate additional demand for library services that would exceed the RCL's ability to meet the Project demand with existing library services. Therefore, because the proposed Project does not plan for the future development of a library, impacts related to library services as a result of Project development are considered significant and adverse. However, the proposed Project would require the payment of Library Impact Fees, which would provide for the future development of library services, the proposed Project's contribution to cumulative impacts to library services would be significant until additional library facilities are constructed and operational.

Public Transportation. Transit services in the vicinity of the Project site are not operating beyond capacity. Based on the scale and size of past, present, and reasonably foreseeable projects that would utilize the same transit services as the proposed Project, these projects are not anticipated to exceed the capacity of those bus services, and no cumulative impacts are anticipated. In addition, the proposed Project would include NEVs and bicycle facilities that would help reduce demands on the existing public transportation system. Therefore, the proposed Project is not expected to have a significant impact on the provision of transit services in the City or the area surrounding the Project site. Any increase that does result from implementation of the proposed Project would be incidental and not cumulatively considerable because transit services would not be adversely impacted by the proposed Project.

Cable, Telephone, and Internet. The geographic area for cumulative analysis of cable, telephone and internet services is defined as the service territory for Time Warner Cable and Verizon. These services are not operating above capacity. However, both Time Warner Cable and Verizon would extend current facilities to meet Project service demands. With these infrastructure improvements, these service providers are anticipated to meet cumulative demands associated with past, present, and future development within the Project area. Therefore, the proposed Project's impacts related to cable, telephone, and internet service would not be cumulatively significant.

Stormwater. The geographic area for the cumulative analysis for storm water drainage impacts includes the City and the Whitewater Watershed. The proposed Project, when considered with each of the cumulative projects, could potentially increase the volume of stormwater runoff and contribute to pollutant loading in runoff reaching the Whitewater River, resulting in potential cumulative hydrology and surface water quality impacts. However, as discussed further in Section 4.9, Hydrology and Water Quality, implementation of mitigation to collect, control, and

treat stormwater flows on the Project site would reduce these cumulative impacts to a less than significant level.

Wastewater. The City's WWTP currently has a treatment capacity of 4.9 mgd and is currently processing an average flow of 2.9 mgd, leaving 2.0 mgd of available capacity. The City's General Plan EIR determined that the City's wastewater distribution and treatment system, with implementation of City policies requiring the provision of a wastewater collection and treatment system that supports existing and planned development within the City of Coachella, would be adequate to serve the City. The Project applicant would be conditioned to pay all applicable Development Impact Fees related to sewer infrastructure. All development applications as part of the proposed Specific Plan would be conditioned to construct all associated sewer lines and infrastructure needed to serve the planned development areas. All sewer facilities and connections would be designed and installed consistent with the City's requirements. Nonetheless, the payment of sewer connection fees and installation of sewer connections and facilities would not be sufficient to reduce the Project impacts related to wastewater treatment to below a level of significance if the capacity of the WWTP is not expanded, As a result, if the WWTP is not expanded by the end of Phase 4, buildout of the Specific Plan, when considered with the demand for wastewater treatment by other projects in the CSD service area, could not contribute to a long-term cumulatively significant impact related to the capacity of the WWTP until the WWTP is expanded.

The Project would not result in significant cumulative impacts to wastewater treatment or wastewater treatment facilities.

Electricity. The proposed Project would increase electrical demand in the area by 7,560,220 kWh per month. Therefore, IID would install two substations and extend transmission lines to include the proposed Project IID's looped transmission system. These infrastructure improvements would ensure that IID has adequate capacity to handle the increase in electrical demand resulting from the proposed Project. In addition, specific energy reduction measures would be incorporated into the proposed Project. The proposed Project's contribution to increased demand for electricity would not be cumulatively considerable natural gas.

The proposed Project would result in a total natural gas demand of 24,512,076 cubic feet per month at Project buildout. SCG would build a gas rectangular station near an existing transmission line to provide a natural gas source to serve the Project site. Construction of this gas rectangular station would ensure sufficient gas supplies to serve the Project site. Therefore, the proposed Project's contribution to increased demand for natural gas would not be cumulatively considerable.

Solid Waste. The proposed Project would generate approximately 98.7 tons per day of solid waste at Project build out. Therefore, the proposed Project in combination with other past, present, and reasonably foreseeable projects within the County, would result in increased demand on landfills and solid waste services in the County. Based on their current capacities, the Lamb Canyon and Badlands Sanitary Landfills are scheduled to close in 2021 and 2024, respectively. Although the proposed Project would comply with solid waste diversion regulations, because the landfills serving the proposed Project would close prior to Project build out of the Specific Plan land uses, the proposed Project's contribution to cumulative impacts related to solid waste would be significant and adverse.

The Project is generally consistent with the City and County General Plan EIRs from an overall land use plan, type and density basis, and as such the cumulative impacts of the Project have

been factored into the City and County General Plan EIRs. The City and County General Plan EIRs are a more appropriate tool for addressing and mitigating cumulative impacts to public services and utilities.

Reference: Final EIR, pages 4.14-32 through 4.14-35.

RECREATION RESOURCES

Finding

Implementation of the Project would not result in cumulative recreational resources impacts with implementation of mitigation measures (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

Facts in Support of Finding

The proposed Project would contribute to a cumulative growth in population (refer to Section 4.13 of the Draft EIR). However, because the proposed Project includes approximately 344.7 acres of park/recreational areas, 381 acres of open space, and 176 acres of drainage/wash area that exceeds the minimum requirements of the City, implementation of the proposed Project would not have a significant cumulative contribution to increased uses and physical deterioration of existing parks and recreational facilities. Additionally, the proposed Project would not only meet the parkland needs for the anticipated growth in population associated with Project implementation, but it would eliminate the existing citywide deficit of parkland in the City.

Implementation of the proposed Project in combination with cumulative projects in the area would increase use of existing parks and recreation facilities. However, as future residential development is proposed, the City would require developers to provide the appropriate amount of parkland or pay the in-lieu fees, which would contribute to future recreational facilities. Payment of these fees and/or implementation of new parks on a Project-by-Project basis would offset cumulative parkland impacts by providing funding for new and/or renovated parks equipment and facilities, or new parks. Measure 4.15.1 is provided to document the commitment in the Specific Plan for the provision of 344.7 acres of parkland. Therefore, the Project's cumulative contribution impacts to parks and recreation resources would be less than significant, and no mitigation is required.

Reference: Final EIR, pages 4.15-12 through 4.15-13.

TRAFFIC

Finding

Implementation of the Project would result in cumulative recreational resources impacts with implementation of mitigation measures (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

Facts in Support of Finding

Under Year 2035 plus Project buildout (with Avenue 50 Interchange) conditions, the proposed Project contributes to a cumulative impact at the 64 intersections. Impacts to these intersections would be fully mitigated to a less than significant level through implementation of Mitigation Measures 4.16.1 through 4.16.4. However, there are 42 intersections that are under the jurisdiction of other agencies (Caltrans, Indio, and Riverside County) and outside of the City's

jurisdiction (including one intersection that is both outside of the City's jurisdiction and cannot be improved to the LOS standard).

There is no existing mechanism for the proposed Project to pay into the local Indio or County DIF program and Caltrans does not have a DIF program. In addition, the City cannot guarantee delivery of improvements at jointly controlled locations at jurisdictional boundaries. An additional two intersections cannot be improved to the LOS standard even with mitigation due to physical constraints. For this reason, Year 2035 cumulative impacts from the proposed Project would remain significant and unavoidable at these 44 intersections.

With respect to the cumulative impacts to State facilities identified in the DEIR for the Existing Plus Project Build-out and 2035 Plus Project Build-out time horizons, the City does not control the implementation of freeway improvements. For this reason, the City cannot ensure that the identified freeway mainline lane and merge/diverge location improvements would be constructed prior to that time the LOS is forecast to fall below identified performance standards.

On the local level, the City through its Circulation Element contained within its General Plan, maintains policies whereby the City commits to work closely with regional infrastructure planning entities and to continue to identify new circulation and roadway improvements.

The Project's cumulative contributions to traffic on I-10 and SR-86 under long-range 2035 conditions are considered to be significant and unavoidable.

The Project is generally consistent with the City and County General Plan EIRs from an overall land use plan, type and density basis, and as such the cumulative impacts of the Project have been factored into the City and County General Plan EIRs. The City and County General Plan EIRs are a more appropriate tool for addressing and mitigating cumulative impacts to traffic and circulation.

Reference: Final EIR, pages 4.16-27 through 4.16-29.

WATER SUPPLY

Finding

Implementation of the Project would result in cumulative water supply impacts.

Facts in Support of Finding

The planned future uses within the City and CVWD over the next 20-year period have decreased due to economic slowdown and related market factors. Thus, the water demand associated with those uses is much less than the forecasted demand associated with projected growth rates in population as set forth in CVWD's 2010 planning documents and in regional and County forecasts. The Project's WSA evaluated potential water supply impacts of the proposed Project against a greater long-term water demand than is required by SB 610 and CEQA.

Based on the conclusions documented in the La Entrada WSA, the total projected water supplies available to the City during normal, single-dry, and multiple-dry water years during a 20-year projection are sufficient to meet the projected water demand associated with the proposed La Entrada Project, in addition to the City's existing and planned future uses, including agricultural and manufacturing uses. In addition, CVWD has concluded in its 2010 CVWMP that the total projected water supplies available to the Lower Whitewater River Subbasin area during normal, single-dry and multiple-dry periods throughout the year 2045 are sufficient to meet the

water needs of existing uses and projected growth throughout CVWD, specifically including the future water needs within the City and its sphere of influence.

Further, the proposed La Entrada Project is identified in the 2010 CVWMP (referred to then as the Lomas del Sol Project), and the demands associated with the proposed Project have been accounted for as part of CVWD's regional water supply planning efforts and conclusions of water supply sufficiency through the year 2045.

The proposed Project's contribution to water demand in the City would not be cumulatively considerable.

Reference: Final EIR, pages 4.17-54 and 4.17-55.

7.0 FINDINGS REGARDING PROJECT ALTERNATIVES

Pursuant to Public Resources Code Section 21002 and the CEQA Guidelines Section 15126.6(a), an EIR must assess a reasonable range of alternatives to the Project action or location.

(a) Section 15126.6(a) places emphasis on focusing the discussion on alternatives which provide opportunities for eliminating any significant adverse environmental impacts, or reducing them to a level of insignificance, even if these alternative would impede to some degree the attainment of the Project objectives, or would be more costly. In this regard, the EIR must identify an environmentally superior alternative among the other alternatives.
(b) As with cumulative impacts, the discussion of alternatives is governed by the "rule of reason."
(c) The EIR need not consider an alternative whose effect cannot be reasonably ascertained, or does not contribute to an informed decision-making and public participation process.

The range of alternatives is defined by those alternatives, which could feasibly attain the objectives of the Project.

As directed in CEQA Guidelines Section 15126.6(c), an EIR shall include alternatives to the Project that could feasibly accomplish most of the basic objectives of the Project. The primary objectives of the Project, as stated within the Final EIR, are to:

- Develop a master-planned community that incorporates fundamentals of great neighborhood design by balancing land uses, providing for vehicular and pedestrian mobility, providing for the preservation/enhancement of recreation and open spaces, and reducing the impacts of the previous development approvals;
- Establish a land use plan that locates active uses, community-serving elements, higher densities, and mixed-use designations within activity nodes ("Community Cores");
- Create central activity nodes with reduced development intensity along the site's periphery;
- Identify opportunities for a variety of residential land uses through the development, with high- and medium-density uses located in proximity to transit and mixed-use activity nodes/community cores;

- Provide a full range of residential, commercial, recreational, and business activities and services to the City;
- Distribute commercial uses in intensified core areas throughout the site to promote the ability to access retail services through non-vehicular modes of travel and deemphasize an auto-centric orientation;
- Implement a circulation plan that enhances connectivity with existing General Plan Circulation Element roadways, promotes connections to existing downtown Coachella via Avenues 50 and 52, and provides the opportunity for a future freeway interchange with I–10 at Avenue 50;
- Create a network of non-vehicular multipurpose pathways through the development that promotes connectivity to schools, commercial areas, and recreation facilities, and allows for greater mobility for residents;
- Provide a variety of recreational opportunities, incorporating a comprehensive trail system, parks, and recreation areas;
- Develop a land use plan that is responsive to the topography and reduces hillside grading where possible, preserving select natural features in their original state and concentrating higher-density residential uses in areas with more gently sloping topography;
- Retain the existing drainages on site to use as open space connections for pedestrian and non-motorized mobility along their edges and for storm flow conveyance;
- Create a land use concept that avoids development within areas of known geologic hazards through the use of appropriate recreational uses, setbacks, and restricted use areas;
- Implement green building practices and sustainable development methods throughout the Project; and,
- Implement community design and landscaping elements that complement and are responsive to the Coachella Valley desert environment.

As directed in CEQA Guidelines Section 15126.6(c), an EIR shall include alternatives to the Project that could avoid or substantially reduce one or more of the significant effects

Typically, where a Project causes significant impacts and an EIR is prepared, the findings must discuss not only how mitigation can address the potentially significant impacts but whether Project alternatives can address potentially significant impacts. But where all significant impacts can be substantially lessened, in this case to a less-than-significant level, solely by adoption of mitigation measures, the lead agency, in drafting its findings, has no obligation to consider the feasibility that Project alternatives might reduce an impact, even if the alternative would mitigate the impact to a greater degree than the proposed Project, as mitigated.

Because not all significant effects can be substantially reduced to a less-than-significant level either by adoption of mitigation measures or by standard conditions of approval, the following section considers the feasibility of the Project alternatives as compared to the proposed Project.

As explained below, these findings describe and reject, for reasons documented in the Final EIR and summarized below, each one of the Project alternatives. The evidence supporting these findings is presented in Section 5 of the Draft EIR.

ALTERNATIVES ELIMINATED FROM FURTHER CONSIDERATION

An EIR should identify alternatives that were considered by the lead agency but were rejected as infeasible. Factors to be considered when addressing the feasibility of an alternative include the ability to meet most of the basic Project objectives and the ability to avoid or substantially lessen significant environmental impacts. Other factors to be considered include site suitability, economic viability, availability of infrastructure, general plan consistency, jurisdictional and regulatory limitations, and whether the Project proponent can reasonably acquire, control, or otherwise have access to an alternative site. An EIR need not consider an alternative that would result in effects that cannot be reasonably ascertained and for which implementation is remote and speculative.

In determining an appropriate range of alternatives to be evaluated in the EIR, a number of possible alternatives were initially considered by the City and, for a variety of reasons, rejected. Alternatives were rejected because they could not accomplish most of the basic objectives of the Project, would not have resulted in a reduction of potentially significant impacts of the proposed Project, or were considered infeasible. The reasons for not selecting the rejected alternatives are discussed below.

Alternative Location. Locating the proposed Project on another site within the City could achieve the objectives of the proposed Project, which include providing a diverse range of residential product types and housing densities; providing for the orderly and master-planned development of land uses in the Project area to ensure that an economically viable Project can be developed; recognizing the unique environmental qualities of the site by retaining portions of the site for open space and recreational uses; creating a high-quality community to meet the needs of individuals and families seeking affordable or move-up housing complemented by open space areas; adding jobs to the local economy; and, generating additional sales tax revenues for the City.

The specific alternative location sites considered and rejected for the proposed Project are briefly described below:

- *Desert Lakes Property*. This alternative site (Figure 5.1, Alternative Site Locations, of the DEIR) would still need infrastructure to be brought up through the Project site to get potable water and sewer flows to the Coachella Waste Water Treatment Plant at Avenue 54 and Polk Street. The Desert Lakes property could be developed in uses similar to the uses in the proposed Project, which would result in similar significant and unavoidable impacts as identified for the proposed Project (e.g., aesthetics, agricultural resources, air quality, geology and soils, GHGs, traffic, and public services/utilities). The Desert Lakes Property would not result in a conversion of designated Farmland because there is no designated Farmland on that property. Although this alternative location site would avoid the significant and unavoidable impact associated with the conversion of designated Farmland, this alternative could result in a new significant and unavoidable impact to biological resources. This alternative location site would not avoid or lessen the overall significant impacts of the proposed Project on the Project site. In addition, the Project site is not owned by the Project proponent. Based on this information and the guidance provided in CEQA Section 15126.6(f)(2)(A), this alternative site was eliminated from further consideration.

- *Shadow View Area*. A 1,200 ac alternative site consisting of the 750-acre Shadow View Specific Plan property and land adjacent to that property was considered

(Figure 5.1, Alternative Site Locations, of the Final EIR). The total amount of farmland (442 acres) that would be converted to urban uses with the development of the Shadow View area would be substantially more than the amount of farmland that would be converted under the proposed Project (9.5 acres). Unlike the proposed Project, the development of the Shadow View area would have substantially greater potential to result in the additional conversion of adjacent farmland to urban uses. There are pending plans for development at this regional commercial destination around the Spotlight 29 Casino. The Twentynine Palms Band of Indians is expanding the Spotlight Casino property to include a 47-acre hotel/resort complex at Dillon Road and Shadow View Boulevard, immediately east of the existing casino property. Additionally, the Cabazon Band of Indians has approximately 30 acres of reservation land, with a long-range plan for commercial uses in the vicinity of Avenue 49 and Tyler Street.

Based on preliminary information, the Shadow View area alternative site would not avoid or result in a substantial reduction of the significant and unavoidable impacts (e.g., aesthetics, agricultural resources, air quality, farmland, geology and soils, GHG, traffic, and public services/utilities) associated with the La Entrada Specific Plan and would only result in similar impacts on a different Project site. This alternative location site would not be able to accommodate all the land uses in the proposed Project because, at approximately 750 acres, it is substantially smaller than the approximately 2,200-acre Project site. The Shadow View Specific Plan site is approximately one-third the size of the La Entrada Specific Plan site. If the same types and densities of land uses proposed for the La Entrada Specific Plan site were assumed at the Shadow View Specific Plan property, the total amount of development would be only about one-third the amount of development proposed for the La Entrada Specific Plan site. In addition, the Project proponent does not own the Shadow View Specific Plan property or land in the immediate vicinity of that property. Based on this information and the guidance provided in CEQA Section 15126.6(f)(2)(A) above, this alternative site was eliminated from further consideration.

EVALUATION OF SELECTED ALTERNATIVES

Alternative 1: No Project/McNaughton Specific Plan Alternative

This alternative evaluates the circumstances under which the proposed Project would not proceed and assumes that the existing General Plan land use designations of Low-Density Residential (LDR), Medium-Density Residential (MDR), Entertainment Commercial (C-E), General Commercial (C-G), and Open Space (O-S) and the zoning of "Specific Plan" would continue to be the regulating land uses for the Project site. For this No Project Alternative, it is assumed that the Project site would be developed as foreseen in the approved McNaughton Specific Plan. The approved McNaughton Specific Plan allows for the development of the 1,788 ac within the City (and no land in unincorporated Riverside County) with up to 8,000 low-, medium-, and high-density residential dwelling units; 2,792,196 square feet of commercial, office, and hotel/hospitality uses; 191 acres of parks or recreational uses; and 257 acres of open space uses (McNaughton Specific Plan 88-3, General Plan Amendment 88-8, EIR 1998).

Because the No Project/McNaughton Specific Plan Alternative assumes the allowable development under the approved McNaughton Specific Plan, the development of a master-planned community with adequate infrastructure to serve it would occur. As a result, residential, commercial, office, and park uses and roads and other infrastructure facilities would be developed on the Project site. Under the approved McNaughton Specific Plan, up to 8,000

residential units and up to 2,792,196 square feet of commercial, office, and hotel/hospitality uses could be constructed. This is more residential units and commercial space than proposed under the La Entrada Specific Plan on 412 fewer acres. The No Project/McNaughton Specific Plan Alternative would fulfill the majority of the basic objectives of the proposed Project.

Under No Project/McNaughton Specific Plan Alternative, significant impacts associated with agricultural resources, and geology and soils would remain the same as those identified for the proposed Project. Operational air quality, GHG, and traffic impacts would be increased due to increased anticipated traffic volumes and would remain significant. The development that could occur under the No Project/McNaughton Specific Plan Alternative would result in similar but incrementally greater significant environmental impacts for aesthetics and public services and utilities than the proposed Project.

Alternative 2: No Project/No Development Alternative

Under the No Project/No Development Alternative, the Project site would remain vacant and undeveloped. This alternative would not include the development of the Project site with the land uses in either the proposed La Entrada Specific Plan or the adopted McNaughton Specific Plan (the latter being consistent with the General Plan land use and zoning). No Project/No Development Alternative allows for a comparison of the effects of the proposed La Entrada Specific Plan with the effects of leaving the Project site in its current undeveloped condition.

In the absence of development on the Project site, no impacts would occur and No Project/No Development Alternative would be the Environmentally Superior Alternative. However, Alternative 2 would not fulfill any of the objectives of the proposed Project. Retention of the Project site in its current vacant and undeveloped condition would not provide for housing with supporting land uses or additional employment opportunities in the City, and would not generate sales tax or increased property tax revenues for the City.

Alternative 3: Retirement Community Alternative

The Retirement Community Alternative would implement a Specific Plan with the same land uses and layout as the proposed Project but with senior housing replacing the single-family housing units in the proposed La Entrada Specific Plan. As shown earlier in Table 5.A, Alternative 3 would include 7,800 age-restricted (senior) dwelling units, 1,510,879 square feet of commercial/office uses, 345 acres of park uses, and 557 acres of open space use. Similar to the proposed Project, Alternative 3 would include the extensions of Avenues 50 and 52 onto the Project site, as well as the other proposed infrastructure facilities.

Alternative 3 would meet most of the Project objectives to develop a residential mixed-use master-planned community. With the Retirement Community Alternative, impacts related to aesthetics, agricultural resources, and geology and soils would be similar to those under the proposed Project. Although reduced in magnitude, air quality construction and operational emissions, GHG emissions, and operational traffic impacts at certain roadway segments and intersections under Alternative 3 would still be significant and unavoidable, similar to the proposed Project. The decrease in household size (i.e., senior citizen households tend to be smaller than the average household) would result in fewer residents on the Specific Plan site than with the proposed Project. As a result, Alternative 3 would have a reduced demand for public services and solid water. However, as with the proposed Project, although the payment of fees and adherence to utility requirements would reduce these impacts, there would still be a need to provide additional fire, police, and library facilities to meet response time requirements. Impacts would, therefore, remain significant and unavoidable until such time that additional

facilities are constructed. Because of the reduction in vehicle trips achieved under Alternative 3, impacts to the operation of local roadways and intersections would be proportionate compared to the proposed Project, but would remain significant and unavoidable.

This alternative would have similar or slightly reduced impacts, and would not avoid the Project's unavoidable significant impacts. This alternative would also not be consistent with the Project's goal and City Housing Element goal of providing a diverse range of housing types. There is no evidence suggesting that the City of Coachella could support a demand for this quantity of senior housing. Therefore, this alternative is not under consideration by the City.

Alternative 4: No Annexation Alternative

The No Annexation Alternative would include the proposed Specific Plan land uses on the 1,612-acre portion of the Project site in the City and would exclude the 588-acre area in unincorporated Riverside County. Alternative 4 would reduce the number of residential units to 6,504 and would eliminate approximately 26 acres of park uses, 207 acres of open space, and one 16-acre school site. Under Alternative 4, it is assumed that some drainage channel improvements would still be required within the County to facilitate stormwater runoff that originates from a large area north of I-10 through the Project site and southwest toward the Coachella Canal. Similar to the proposed Project, Alternative 4 would also include the extensions of Avenues 50 and 52 onto the Project site.

Alternative 4 would meet the majority of the Project objectives to develop a residential mixed-use master-planned community. With the No Annexation Alternative, impacts related to aesthetics, agricultural resources, and geology and soils would be similar to those under the proposed Project. Although reduced in physical size and intensity, short-term air quality construction emissions, long-term air quality operational emissions, GHG emissions, and operational traffic LOS for certain roadway segments and intersections under Alternative 4 would remain significant and unavoidable, similar to the proposed Project. The reduction in development under Alternative 4 would result in a reduction in the total number of residents and employment opportunities on the site, which would result in reduced demand to public services and solid waste. Although the payment of fees and adherence to utility requirements would reduce these impacts, there would still be a need to provide additional fire, police, and library facilities in order to meet response time requirements. Similar to the proposed Project, public service impacts under Alternative 4 would remain significant and unavoidable until such time as facilities are constructed. Because of the reduction in vehicle trips achieved under Alternative 4, impacts to the operation of local roadways and intersections would be proportionally reduced from the proposed Project, but would remain significant and unavoidable.

This alternative, the "Environmentally Superior Alternative", would result in similar or slightly reduced impacts than the Project. However, it would result in less housing and other Project-related uses. Reduction in Project density would affect the Project's flexibility in providing onsite and offsite amenities and improvements due to economies of scale. More importantly, this alternative does not preclude the potential for the annexation area to be developed at a later date, and future development separate from the La Entrada Specific Plan would likely result in a less cohesive land use plan and less effective provision of regional infrastructure improvements such as Avenue 50 and 52 extensions. Furthermore, exclusion of the annexation area would require revision and reconfiguration of the Specific Plan, as the annexation area is an integral part of the overall land use plan (as shown in Final EIR Figure 3.6). Eliminating the annexation area would essentially bisect the Hillside Village portion of the Project, and would require reconfiguration or elimination of school and park sites, internal circulation, Avenue 52 extension,

water quality basins, the Vista Park, and a recreational center. For these reasons, this alternative has been rejected by the City of Coachella.